UNITED STATES OF AMERICA FEDERAL ELECTION COMMISSION

:
In re MUR 4378 ::

Washington, D.C.

Thursday, November 13, 1997

Deposition of:

LADONNA Y. LEE

a witness, called for examination by counsel for the Federal Election Commission, pursuant to notice and agreement of counsel, beginning at approximately 10:40 a.m., at the Federal Election Commission, 999 E Street, Northwest Washington, D.C., before Ginger Marie Brewster, a notary public in and for the District of Columbia, when were present on behalf of the respective parties:

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1	APPEARANCES:
2	On Behalf of Federal Election Commission:
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5	Washington, D.C. 20463 (202) 219-3690
6	On Behalf of Witness:
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PROCEEDINGS

Whereupon,

LADONNA Y. LEE

was called as a witness and, having been first duly sworn, was examined and testified as follows:

EXAMINATION BY COUNSEL FOR FEC

Q Would you give your full name for the record.

BY MS. WEISSENBORN:

- A Ladonna Fern Lee.
- Q My name is Anne Weissenborn. I'm here with Mary Ann Bumgarner representing the Office of the General Counsel of the Federal Election Commission.

Your deposition is being taken

pursuant to a subpoena issued to you as a

witness by the Federal Election Commission in

connection with an investigation being

undertaken pursuant to 2 U.S.C. Section 437g.

The enforcement matter of which this

investigation is a part has been designated

1	MUR 4378.
2	Just before this deposition began,
3	you signed a confidentiality advisement
4	statement which I'm going to show you just as
5	soon as we have it marked as an exhibit.
6	(Lee Deposition Exhibit No. 1
7	was marked for identification.)
8	MR. CACCIA: Only because I'm feeling
9	left out, I'm going to identify myself for the
10	record. Also present is Ralph Caccia,
11	C-a-c-c-i-a, of the law firm of Powell,
12	Goldstein, Frazer & Murphy, representing
13	Ms. Lee for purposes of this deposition.
14	BY MS. WEISSENBORN:
15	Q With regard to the confidentiality
16	advisement, Exhibit 1, is this your signature?
17	A Yes, it is.
18	Q Your business address is 900 Second
19	Street, Northeast, Suite 200, Washington, D.C.
20	Is that correct?
21	A That's correct.
22	Q This document provides that the

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prov	/is ior	n hold	ls unt	il the	comm	ission	has	closed
its	file	in th	e mat	ter.				

Have you ever been deposed before?

Yes, I have.

Q So you know that I'm going to be asking you a series of questions that you're being asked to answer under oath. If you don't understand a question that I ask, feel free to stop me, ask me to restate or rephrase it.

you have given is incomplete or inaccurate, just let me know and you can amend or add to the answer. If you don't stop me or request a chance to amend your answer, we'll assume that the answer you gave has been responsive to the question. As you know, you can't shake your head. We need a yes or a no.

I'm going to do my best to avoid repetitious questions, but I might go back a little bit, in terms of time, and may have to

1	ask things that seem to be things you've
2	answered before. It will be for a particular
3	purpose. We're not trying to drag this out.
4	Are you represented by counsel?
5	A Yes, I am.
6	Q Have you retained counsel personally?
7	A Yes, I have.
8	Q He wasn't retained for you by someone
9	else?
10	A Right.
11	Q Have you discussed this deposition
12	with anyone other than your attorney?
13	A No, I have not.
14	Q Have you brought any documents or
15	other materials with you?
16	A No, I have not.
17	Q Just a little bit about your
18	background.
19	Can you tell us what your educational
20	background is?
21	A I attended the University of Northern
22	Colorado.

1	Q Your present employment?
2	A I'm president of the Eddie Mahe
3	Company.
4	Q The business address is the one you
5	gave us on the confidentiality form, right?
6	A Yes, it is.
7	Q What is the nature of the company's
8	business?
9	A We do strategic consulting.
10	Q Consulting of what types?
11	A Our primary business is corporate
12	consulting. And probably 90 percent of our
13	business in any two-year period is corporate or
14	association. We do one or two political
15	campaigns a two year cycle.
16	Q How long have you been there?
17	A I joined the firm in 1981.
18	Q Prior to this present position, what
19	other positions have you held; for example, the
20	one immediately preceding this one?
21	A I was the deputy political director
22	of the National Republican Congressional

1	Campaign Committee.
2	Q How long were you there?
3	A About a year.
4	Q Before that?
5	A I was political director to John
6	Connolly's "For President" campaign.
7	Q Are you married?
8	A I am divorced.
9	Q You indicated this a bit in the
10	answer before, but prior to 1995/96 had you
11	worked on federal campaigns?
12	A Yes.
13	Q You mentioned Connolly for President.
14	A Uh-huh.
15	Q Have there been others?
16	A Our company, as I said, does one, or
17	two races in recent history, a year, primarily
18	federal races.
19	Q Which ones were those?
20	A There's a long list.
21	MR. CACCIA: We're not going to get
22	into it.

BY MS. WEISSENBORN: 1 2 As far as the 1995/96 campaign season O is concerned, was your firm hired by Montana's 3 "For Rehberg" committee? 4 Yes, it was. 5 About when was the firm hired? 6 7 We probably came to an agreement sometime in mid-year 1995. 8 9 Overall, what was your firm's role Q with the Rehberg campaign? 10 11 We were the strategic consultants. 12 What does that mean? 13 That means that we worked with them Α 14 in terms of the strategy, the message and all, 15 overall aspects of the campaign, the tactics, 16 supported the strategy and message. 17 Is it correct that there was another 18 firm called Richardson & Ziebart who was also 19 involved with the Rehberg campaign? 20 Α They initially were retained. Was there a division of 21

responsibility between your firm and --

1	A They are a fundraising consultant who
2	did not stay throughout the campaign.
3	Q Who was your primary contact within
4	the Rehberg campaign?
5	A It varied. We worked with a
6	candidate directly. We worked with the
7	campaign manager.
8	Q Who was the campaign manager?
9	A Mike Piper.
10	Q Would you characterize Denny Rehberg
11	as a hands-on candidate in terms of planning
12	his campaign and being involved?
13	A He was involved, but he was not
14	hands-on. Hands-on to me implies every day, in
15	and out, making decisions. He wasn't on that.
16	MR. CACCIA: Why don't we clarify
17	what it is you mean by "hands-on," so that her
18	question is responsive.
19	BY MS. WEISSENBORN:
20	Q Was he involved in virtually every
21	decision made about strategy for example?
22	A Well, in terms of strategy, there's

1	lots of different levels. So he was involved
2	in major decisions in the overall direction of
3	the campaign. But he was not involved in every
4	single decision, no.
5	Q When you picked up the phone and
6	called the campaign, would you ask for him
7	first?
8	A He was rarely in the campaign. He
9 ,	was lieutenant governor at the time he was
10	running.
11	Q Who would you normally ask for?
12	A It depended on the nature of the
13	call. The campaign manager sometimes,
14	sometimes different staff people.
1,5	Q What was Tony Payton's role with the
16	Rehberg campaign?
17	A He was also a consultant.
18	Q Elizabeth Bonefort?
19	A She was the finance director and
20	deputy manager.
21	Q We'll get back to some of those folks

in a moment. This is just to get an overview.

1	Who else in your firm was involved in
2	working with the Rehberg campaign?
3	A It depended on the aspect of what we
4	were doing. My partner, Eddie Mahe, in some
5	instances, and a staff person by the name of
6	Ashley Jordan who were the primary, but for
7	different aspects, different members of our
8	firm would perform things.
9	Q But would you say you were the
10	principal person who worked with the campaign?
11	A We don't divide it up in that aspect.
12	Again, it just depended on the nature of what
13	the situation was.
14	Q Was one of your firm's
15	responsibilities to act as a liaison with the
16	National Republican Senatorial Committee, with
17	regard to the Rehberg campaign?
18	A Yes.
19	Q Who were your principal contacts at
20	the NRSC?
21	A Joanne Barnhardt.
22	O Her role was?

(703) 684-2382

1	A She was the political director, and a
2	gentleman by the of Phil Griffin or Griffith.
3	I don't recall.
4	Q What was his position?
5	A He was one of the political field
6	people.
7	Q When you say "field people," what do
8	you mean? Was he in the field as such?
9	A Not much. He rarely came to Montana,
10	but he had responsibility for states.
11	Q He was based in Washington. Is that
12	correct?
13	A I believe so.
14	Q Did you ever have much contact with
15	Wes Anderson?
16	A Sporadic possible phone calls
17	but rarely.
18	Q In terms of your contacts with the
19	NRSC, what kinds of subjects would you be
20	addressing when you would contact them or when
21	they would contact you?

We would communicate on a periodic

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basis.	We had	an inte	erest in	the	status	of	the
campaign	n, what	we were	e doing.	We	had an		
interest	t in mal	king su	e that	we go	t suppo	ort,	
that the	ey give	to cand	didates	who w	ere se	en a	ន
having a	a shot a	at winni	ing.				

- Q What kind of support do you mean?
- A Well, the first one is obviously the coordinated expenditure which is the primary thing that you make sure that you have the information, so you get the contributions so that you have that.

Secondly, the primary resource that the Senatorial Campaign Committee is to advise others on whether it's a credible campaign. So if they are out bad-mouthing you, it hurts your fundraising. If they're saying nice things about you, it helps your fundraising.

- Q How would you characterize your relationships with the NRSC looking back on it?
- A Fairly standard. They had a job to do. We had a job to do.
 - Q Did you ever raise the issue,

1	concerning the content of the advertising t	hat
2	they were doing in Montana?	

MR. CACCIA: Do we have a time frame we're talking about?

BY MS. WEISSENBORN:

Q 1996.

A In 1996, we were very concerned.

They ran an ad as, discussing Mr. Baucus'
voting record, which was erroneous. The
cardinal rule in any advertising, whether it's
for a product or a campaign, is it's factual
and it's documented. They violated that
cardinal rule. Mr. Baucus turned that back and
claimed it was Denny's advertising and that it
was his fault. It was very damaging to our
campaign.

Q Was it you who contacted them about this?

A I do not recall specifically the phone call, but I know that I had discussions with Phil Griffith in terms of specifically the fact that what were they going to do to rectify

1	this damage they were causing him.
2	Q When you had these contacts, were
3	they primarily by telephone?
4	A Yes.
5	Q Did you ever go over and meet with
6	them?
7	A We would meet once every two or three
8	months in person.
9	Q At their office usually?
1.0	A Yes.
11	MS. WEISSENBORN: Off the record.
12	(Discussion off the record)
13	BY MS. WEISSENBORN:
14	Q Before we go on to the specifics, I
15	want to clarify something you said earlier.
16	You were talking about the division of labor
17	within your company with regard to the Rehberg
18	campaign, and you mentioned different people
19	involved.
20	Could you tell us exactly which
21	aspect was your responsibility and which was

Mr. Mahe's and so forth.

	A we don't divide it that way. We'le a
	small firm. It depends on we have other
	clients obviously. It depends on who the
	campaign calls. It would depend upon which one
	of us was there. If I started something, I
	would probably follow through on it. So more
	circumstantial decision rather than division by
	specifics.
	Q So that was all by way of, sort of
	background. Let's turn to some specifics and
	ask to have this marked Exhibit 2.
	(Lee Deposition Exhibit No. 2
	was marked for identification.)
	BY MS. WEISSENBORN:
	Q Exhibit 2 is composed of, as you can
	see, schedules for, entitled "Denny Rehberg."
	Did you for July 16th through the
	19th of, I believe, 1995, it doesn't say the
	year, do you recognize these schedules?
	MR. CACCIA: She's still reviewing
1	them.

MS. WEISSENBORN: Sorry.

1	MR. CACCIA: What was the question?
2	BY MS. WEISSENBORN:
3	Q Do you recognize this at all?
4	A I don't recognize the specifics, but
5	it is a series of appointments for Denny
6	Rehberg.
7	Q Would you have made up this schedule?
8	A No.
9	Q Do you have any idea who did these
10	for him?
11	A I do not recall.
12	Q Do you recall whether Mr. Rehberg, in
13	fact, made a trip to Washington, D.C. in July
14	of 1995?
15	A I know he made a trip in the summer
16	after he announced his candidacy.
17	Q Do you remember if anyone accompanied
18	him to Washington?
19	A I don't.
20	Q Did you have any input into what his
21	schedule was going to be for that summer visit
22	to Washington?

1	MR. CACCIA: Are we assuming that the
2	visit referred to on the calendar is the same
3	visit? What visit is it you're talking about
4	now?
5	MS. WEISSENBORN: She mentioned that
6	she remembers a summer visit. Yes, I am
7	assuming that this is it.
8	THE WITNESS: In '95.
9	BY MS. WEISSENBORN:
10	Q It was in July of '95, right.
11	Did you have any input into making up
12	the entire program for when he was coming?
13	A I don't recall this specific trip.
14	Either myself or one of my staff people, when
15	any of our candidates come to town, make
16	recommendations of who they should visit. I
17	don't recall the specifics of this trip.
18	Q So in terms of, generally, the areas
19	that are blacked out, would you have any idea
20	of what kinds of appointments those were?
21	A I really don't.

Down at the bottom of that page it

Q

1	refers to a meeting with Senator Alfonse
2	D'Amato at 5:30 p.m. Did you accompany
3	Mr. Rehberg?
4	A I did not.
5	Q Did anyone from your firm accompany
6	Mr. Rehberg to this meeting with Mr. Senator
7	D'Amato?
8	A No.
9	Q Do you remember Mr. Rehberg ever
10	reporting back to you as to what they
11	discussed?
12	A I do not.
13	Q All right. On the next page, which
14	is the schedule for Tuesday, July 18th,
15	presumedly, '95, at 9:00 a.m. there's an
16	appointment at the NRSC for a meeting with John
17	Heubusch.
18	Do you remember whether you
19	accompanied Mr. Rehberg to that meeting?
20	A I did not.
21	Q Did anyone else from your firm, do
2.2	Trou romambor?

1	A No.
2	Q Do you remember whether you organized
3	that meeting or set it up?
4	A I do not recall any of these
5	meetings.
6	Q The next item is a 9:15 a.m. meeting
7	with a number of individuals named from the
8	NRSC. Do you remember being at that meeting
9	yourself?
10	A I attended a meeting on opposition
11	research. I do not recall being at a meeting
12	with all the people that are listed on this
13	list. So I don't know if it was the same
14	meeting or not.
15	Q But with Mr. Rehberg you remember
16	such a meeting.
17	A We had one meeting on opposition
18	research that I attended, yes.
19	MR. CACCIA: Would that meeting have
20	been in this time frame?
21	THE WITNESS: It would have been

sometime during '95 when we got the initial

1	research package that they prepared.
2	BY MS. WEISSENBORN:
3	Q Was it your experience that the NRSC
4	would, as just a matter of general practice,
5	hold a meeting such as this with each
6	candidate, each perspective candidate?
7	A Oh, yes. They have just done so in
8	another instance. It's a standard service that
9	they provide campaigns.
10	Q Do you have any memory of who you
11	remember being at that meeting besides
12	yourself?
13	A The one that I attended, I know that
14	Dennis was there, Dennis Rehberg and Joanne
15	Barnhardt and someone from their research
16	division. I don't recall who it would have
17	been.
18	Q Do you remember what all was
19	discussed at that particular meeting? Was it
20	just opposition research or what other?
21	A I don't have a specific recall of any
22	of the conversation. The purpose of the

meetings	that	I atte	nded	was a	discussio	n of
the rese	arch	package	that	they	provided	us.

- Q Do you remember them talking about any other kinds of services that they offered to candidates?
 - A Not in this particular meeting.
- Q Do you remember a meeting where they would have gotten into other kinds of services that they were willing to provide?

A Well, one. I've worked with the Senatorial Committee before, so we have a general understanding of the kinds of services they provide. I had conversations at different times.

I had one meeting with Joanne
Barnhardt when she went through some of the
specifics that she was anticipating the
Senatorial Committee would make available.

Our primary focus, during this time frame was that the research package that they had provided was incomplete. It didn't go through the full voting record and other

2	request for them to finish that project.
3	Q Did they ever do so?
4	A Not in any form that we felt was
5	adequate.
6	Q Do you remember some of the other
7	kinds of services that she talked about at the
8	meeting you do remember?
9	A Again, it was not in this meeting,
10	and whether it was a meeting or over the phone,
11	she did discuss the availability of support for
12	their, for fundraising efforts. They make
13	available different opportunities for
14	candidates to meet potential donors, that sort
15	of thing.
16	Q Did she raise the question or the
17	issue of media advertising at all, either by
18	phone or at a meeting?
19	A She discussed with me a program that
20	the party was going to undertake on Mr. Baucus'

things, so we went through a seemingly endless

Would you elaborate on that?

voting record and votes that he was facing.

Q

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1	did she tell you about that?
2	A It was in late 1995 as I recall. She
3	said that they were willing to put \$25,000 or
4	\$35,000, somewhere in that range, into this
5	program.
6	Q You say "they," you mean the NRSC
7	itself?
8	A She said the party and that they were
9	going to share in that. There was some
10	discussion about involvement with the Montana
11	republican party as well.
12	Q Did she talk about specifics as to
13	what issues they were planning to address in
14	that program?
15	A His voting records in terms of how it
16	was or was not in support of what Montana was,
17	generally.
18	Q Did she ask for any input from you?
19	A No. They never ask for any input
20	from us.

to content of what they were planning to do, or

They didn't ask for your critique as

Q

21

1	ask for suggestions?
2	A No. We did not see their content.
3	Q What about stations they were
4	planning to place ads with?
5	A No.
6	Q What about the timing?
7	A No.
8	Q Did they ask for
9	MR. CACCIA: Can we go off the record
10	for one second.
11	(Discussion off the record)
12	BY MS. WEISSENBORN:
13	Q Generally speaking, did you ever see
14	any of the ads that were placed in Montana by
15	the NRSC prior to they're being shown,
16	broadcast?
17	A Our ads?
18	Q The senatorial their ads.
19	A No.
20	Q We'll get into some of the more
21	specific ones later, but just as a general
22	rule

ı		MR.	CA	CCIA:	Exc	ıse me	one	second.
2			((Counse	el cor	nferre	d wit	th witness)
3		вч	MS.	WEISS	SENBO	RN:		
4	Q	Αt	the	time	that	Joanne	e Bai	rnhardt

Q At the time that Joanne Barnhardt told you that they were planning this ad program in Montana, did you express an opinion as to whether or not they should be doing this or ask to have any input?

A No. I mean, in terms of opinion, obviously, any discussion of Mr. Baucus' record was not anything we were adverse to, but we did not get involved in terms of any specifics.

Q During telephone or face to face conversation where you learned that they were planning this, did you make any comments about whether you thought it was an advisable undertaking?

A It was a very conceptual presentation by her that they were intending to do this.

There were a lot of what ifs. We were a little skeptical at that point of their deliverables on a variety of things. I'm sure I processed

1	it and didn't get too excited at the time.
2	Q Did you ask for any kind of
3	notification prior to the ads going on?
4	A No.
5	Q Did you ask to receive copies of the
6	contents afterwards in a script of whatever,
7	something like that, after the fact?
8	MR. CACCIA: After what fact?
9	BY MS. WEISSENBORN:
10	Q After the ads were broadcast?
11	A There would be no need because the
12	Montana people, obviously, that worked with us,
13	provided us with copies of anything that was on
14	the air, whether it was Mr. Baucus' advertising
15	or other campaigns. So that would never enter
16	in my head to do since we relied on our own
17	resource to do that.
18	Q When you said provided you copies,
19	they would make a video copy of the television
20	ad?
21	A We used to sometimes get video copies

more often because you're dealing in a real

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time frame. It would be a -- somebody would go type out or hand write the script and fax it to us.

In terms of -- if you're speaking of the senatorial campaign ads, at that time frame, we would also receive, as most of the political community in Washington, D.C. did, a press release that they disseminated both in Montana and, I assume, locally with the political newsletters here in town, copies of the ads and the press release. They would also release them.

- Q That was their policy, to send these out to all the candidates involved? Is that correct?
 - A It's my understanding.
 - Q It was not that you asked for it?
 - A No. Fax and mail we get every day.
- Q Do you know whether the NRSC contacted the Rehberg campaign directly about the ad program?
 - A I am not aware of any contact.

1	Q As far as you know, you were the					
2	contact that they made					
3	A Oh, no. They dealt directly with the					
4	campaign, as well as me and as well as Denny					
5	directly.					
6	Q But in terms of the ad campaign					
7	itself, your knowledge is only what they told					
8	you directly?					
9	A Yes.					
10	Q Rather than your learning about it					
11	through the campaign; is that correct?					
12	A In terms of where the ad is running?					
13	Q The fact they were going to do this					
14	campaign.					
15	A Oh, they communicated I don't know					
16	in terms of, if your question is, did they only					
17	talk to me					
18	Q That's really my question.					
19	A I would be very surprised if I was					
20	the only person they ever talked to. That was					
21	not the way they operated. They dealt directly					

with the campaign whenever they chose to. But

1	
1	I'm not aware of any specific conversations.
2	(Lee Deposition Exhibit No. 3
3	was marked for identification.)
4	BY MS. WEISSENBORN:
5	Q The purpose of this exhibit is really
6	just to identify some of the people who were
7	mentioned on it.
8	MR. CACCIA: She's still reviewing
9	it.
10	MS. WEISSENBORN: Yes.
11	THE WITNESS: Uh-huh.
12	BY MS. WEISSENBORN:
13	Q This exhibit is apparently a
14	memorandum from Ashley Jordan, who you said was
15	an employee of the Eddie Mahe Company, to Geoff
16	Ziebert. Is that correct?
17	A It's Mahe.
18	Q Mahe.
19	A That's correct.
20	Q Under the cc's, it says, among
21	others, a copy would go to Will Brooke. Who
22	was Will Brooke?

1	A He was one of the campaign					
2	cochairmen.					
3	Q In Montana?					
4	A Excuse me. He was the finance					
5	chairman at the time that this was written in					
6	Montana.					
7	Q In the first sentence it references					
8	Denny's schedule during his last visit to					
9	Washington.					
10	Would you assume that that was the					
11	July visit that we were just looking at, as far					
12	as the schedule was concerned?					
13	MR. CACCIA: Don't assume. Only					
14	answer if you know.					
15	THE WITNESS: I believe he only made					
16	two trips during this time frame. So I would					
17	assume that it refers to the July schedule we					
18	looked at.					
19	BY MS. WEISSENBORN:					
2 0	Q Do you remember when the second trip					
21	was?					
22	A This mamo is dated Sentember 19th so					

1	I would assume it was fairly soon thereafter.						
2	I don't recall the dates.						
3	Q We'll get to that in a moment. I						
4	just wondered if you remembered.						
5	Could you tell me who Robert						
6	Arensberg is?						
7	A He is a works at the HIAA. It's						
8	an association one of the health						
9	associations here in town.						
10	Q Was he affiliated with your company						
11	at all?						
12	A No, not professionally, as a friend.						
13	Q Do you know what kinds of						
14	appointments he would have been responsible for						
15	arranging?						
16	A Robert is very familiar with the PAC						
17	community, so he at various times helped us						
18	with which PAC people to meet.						
19	Q It says also Wes Anderson of the						
20	NRSC, he helped to set up appointments.						
21	Do you know what kind of appointments						
22	he particularly would have looked at?						

1		
1	A I have no idea.	
2	Q Then on the second page, it says,	
3	"Finally, I'd like to set up a meeting with	
4	Priscilla Ruzzo of the NRSC lets figure	out
5	what they are willing to do for Denny on th	eir
6	end."	
7	Do you know if that meeting ever	took
8	place?	
9	A I don't know.	
10	Q In the very last sentence it says	,
11	Jack Ramirez, can you tell me who that is?	
12	A He's a good friend of Denny and J	an
13	Rehberg. He currently he's actually Rob	ert
14	Arensberg's father-in-law.	
15	In terms of his professional sens	e,
16	he is the head of a insurance association i	n
17	Chicago.	
18	Q Let's move on to the next one.	
19	(Lee Deposition Exhibit No.	4
20	was marked for identificatio	n.)
21	BY MS. WEISSENBORN:	
22	Q Do you recognize this memorandum?	

1	A This is a memo that I wrote, yes.
2	Q It doesn't have a date on it, do you
3	have any idea, approximately, when this was
4	written?
5	A I believe, based upon the content,
6	that it's referring to a Christmas party that
7	would have been some time in either late
8	October or November of 1995.
9	Q Is it correct that you went out to
10	Montana around that time?
11	A I made many trips to Montana.
12	This specifically references a trip
13	at that point, so I would say that is correct.
14	Q Do you remember who all was at this
15	particular meeting in Montana?
16	A I don't.
17	Q It references, in the first sentence,
18	conversations with the NRSC.
19	Do you remember what particular
20	conversations you were talking about there?
21	MR. CACCIA: The first sentence of a

particular paragraph?

BY MS. WEISSENBORN:

- Q At the very top.
- A I don't remember a particular time, date or specifics. Later in the memo it references the topic.
- Q Over on Page 3, in terms of assignments, apparently, under NRSC, it says you will undertake the care and feeding and communication with the NRSC.

What does that refer to?

A Just probably a poor choice of words. You think you are dealing with an internal memothat then becomes a public document.

But it was a very difficult relationship in terms of they were not providing us the research information that they told us they would do. It was holding us back on things we needed to do.

We were trying to make a determination if they would in fact make -- meet any of the deadlines they've missed. So we made a determination again to try to log

1	them into getting done.
2	Q Was a prospective ad campaign any
3	part of this communication with them? Would
4	that have been an issue also in determination
5	of the care and feeding?
6	A Well, in terms of this memo, it
7	references the message program that we talked
8	about earlier.
9	Q Under the state party, the last
10	paragraph?
11	A Uh-huh, yes.
12	Q So I believe you had said earlier
13	that you mentioned the figure of \$35,000. This
14	makes it sound as though more of that money was
15	going to be coming with from the state party.
16	Do you know, in fact, whether the
17	state party did come up with that amount?
18	A I do not recall the specifics of what
19	the party in Montana did versus the national

Q On the first page it talks about a

senatorial.

Christmas open house.

20

21

1 Did that ever take place? 2 Α I don't recall the specifics. We did 3 a variety of meetings with Denny, with supporters throughout the year. This was a 4 recommendation of something to do for our key 5 fundraisers. I don't recall the specifics of 6 7 campaign events now many months and days later. In the very last sentence of that 9 paragraph it says, "Joanne agreed she could as 10 well as assisting on the Denver event." 11 Was there a Denver event? 12 Α Yes. 13 Do you remember when that was held? 14 Α It was, it says here, this is an 15 undated one, but I believe it was in late '95, 16 probably December. 17 Is the Joanne you refer to here 18 Joanne Barnhardt? 19 Α Yes, it is. 20 Did she come out for the Denver

No, she did not.

A

event?

21

1	Q On the last page, going back under
2	the NRSC, it indicates that Joanne again,
3	this means Joanne Barnhardt, right?
4	A Yes, it does.
5	Q That "she will work with us to get
6	Denny invited to the Senatorial Trust events".
7	Did he attend the Senator Trust
8	events?
9	A I'm sorry.
10	Q Under the next paragraph, right,
11	under NRSC?
12	A He attended some senatorial trust
13	events, yes.
14	Q Did you ever go to one with him?
15	A No, I didn't.
16	Q Did anyone else from your firm?
17	A Not that I'm aware of.
18	Q I'm sorry to go back and forth, but
19	one more thing on the first page. There's a
20	reference to the Century Club. What was that?
21	A I do not recall it specifically, but

I would assume it's other key leaders, so it

1	was probably our finance team.
2	Q "Our" meaning the Rehberg Team?
3	A The Rehberg, yes. I'm sorry, the
4	Rehberg.
5	Q Then one more time on the second
6	page, there's the blacked out area?
7	MR. CACCIA: We have to go one page
8	at a time.
9	MS. WEISSENBORN: I know. I'm trying
10	not to repeat things that we already talked
11	about.
12	BY MS. WEISSENBORN:
13	Q Right in the middle, the first
14	printed part right under the blacked out area,
15	it talks about "for each of these areas we need
16	the facts*.
17	Am I correct in assuming that this is
18	talking about the factual backup to ads or the
19	research; or what does that mean?
20	A This is regarding the overall
21	research of the campaign. This is the basis

for any research program in a campaign.

You need your record where you have
an incumbent, you need your opponent's record,
if you're talking about specific issues. You
need those statistics that apply to the
particular state you're in. Then obviously,
the different speeches off of the research, you
have to make it listenable to folks who want to
listen.

Q That's talking about the campaign's own research, not the NRSC's research.

Is that correct?

A When you're talking about the research -- yes, would be the answer. Because we are trying -- the NRSC provided a base document. They had agreed to do additional research. Much of that, as I said, was not forthcoming, so we were making efforts to get additional -- to get it done. So we had a research database for the campaign.

MR. CACCIA: We're not going back to page 1?

MS. WEISSENBORN: No, we're not.

1	(Lee Deposition Exhibit No. 5
2	was marked for identification.)
3	THE WITNESS: Okay.
4	BY MS. WEISSENBORN:
5	Q This exhibit is composed of three
6	separate pages, three separate documents. The
7	first is entitled the Rehberg Schedule for
8	October 21st through the 23rd, again, I assume
9	of 1995, it does not say.
10	The next page covers the same period.
11	It's a copy of the calendar of the same period.
12	The last is a newspaper article which we'll get
13	to.
14	Did you prepare this, the first page,
15	the schedule?
16	A I did not personally. Someone in my
17	firm could have.
18	Q Does the type and so forth look like
19	something you would put together?
20	A Our company uses I mean, I can't
21	tell you that came off of our computer. But
22	that's not an unusual format that we use.

1	MR. CACCIA: Do you recognize this
2	particular document?
3	THE WITNESS: Not specifically.
4	MR. CACCIA: Does this look like one
5	generally that you use?
6	THE WITNESS: Yes.
7	BY MS. WEISSENBORN:
8	Q Do you remember Mr. Rehberg making a
9	trip to Washington during this time frame of
10	October 21st, 23rd?
11	A Yes.
12	Q Do you remember if anyone accompanied
13	him on that trip?
14	A I believe that Jan Rehberg did.
15	Q Did Mike Piper, do you remember?
16	A Mike wasn't hired at this point in
17	time.
18	Q Anyone else from his committee?
19	A No.
20	Q Have you ever seen the second page,
21	the calendar?
22	A No, I have not.

1	Q I am presenting it together because,
2	since there are a number of items blacked out
3	on the first page, this seems to fill it in a
4	bit in terms of NRSC related activity.
5	Looking at the calendar on the second
6	page
7	MR. CACCIA: Do you have some reason
8	to believe, based on the way you're asking the
9	question, that this is a Rehberg calendar? I
10	don't see a designation like I did on the other
11	one.
12	MS. WEISSENBORN: It was supplied by
13	the campaign.
14	BY MS. WEISSENBORN:
15	Q On Monday the 23rd at 9:30 it says,
16	DR interview with Mike Myers of The Hill at the
17	NRSC.
18	Did your firm make arrangements
19	for
20	MR. CACCIA: Just so the record is
21	clear, it says, in parens, no attend.
22	MS. WEISSENBORN: I haven't asked

1	what that means, if you have an idea
2	BY MS. WEISSENBORN:
3	Q Was part of your role to set up press
4	interviews?
5	A Part of our role was always to make
6	sure that the candidate's schedules were filled
7	out. We would include the political
8	newspapers, as well as PACs, as well as issue
9	people.
10	I do not know, at this instance,
11	whether my staff set this up or whether the
12	others working, Geoff Ziebart who were off
13	hunting the following Sunday according to this
14	record, which makes me wonder if it really is
15	Denny's calendar because I'm surprised he would
16	put his shooting schedule on Denny's calendar.
17	So I don't know who made it specifically.
18	Q Did you go to this interview?
19	A No.
20	Q Did anyone else from your firm that
21	you remember?
	f ·

A

No.

۸ ۱	Q The newspaper arcicle, which is dated
2	October 24th, a newspaper in Missoula, Montana,
3	over on the very right-hand column, the top
4	sentence talks about a "meet and greet luncheon
5	today, the 24th.
6	MR. CACCIA: Ms. Weissenborn, where
7	are you, which column?
8	MS. WEISSENBORN: Right here.
9	(Indicating)
10	BY MS. WEISSENBORN:
11	Q What is a meet and greet luncheon?
12	Do you know?
13	A A meet and greet is standardly used
14	to refer to an opportunity for people to meet
15	the candidate and understand what his positions
16	are on issues.
17	Q Is that something that your firm
18	would have set up?
19	A As I said, when we had him in town,
20	we assisted on it. The PAC fundraiser had the

primary responsibility for it, but we assisted.

Can I just ask a question?

A lot of

21

1	this doesn't seem to have anything I'm
2	sorry. I thought it was regarding Senatorial
3	Committee meetings. I just, against time, of
4	how this applies but I'm sorry, that's not
5	my job.
6	Q Do you remember going to that
7	meeting?
8	A I did not.
9	Q Do you remember whether anyone else
10	from your firm attended that particular
11	luncheon?
12	A I do not recall specifically. It is
13	possible that Ashley Jordan may have.
14	Q Back on the calendar, the middle one,
15	that second page, at 1:45 p.m. it has a meeting
16	of DR, Dennis Rehberg, with Ken Rudin of
17	Hotline at the NRSC.
18	Would you have accompanied him to
19	that particular interview?
20	A I did not.
21	Q Then down at the bottom of that same

column, at 4:00 there is, what I'm interpreting

1	to be, a Steering Committee meeting at the
2	NRSC.
3	Is that correct? Is that how you
4	would interpret ST?
5	A Yes.
6	Q What was the Steering Committee?
7	A It would refer to the PAC Steering
8	Committee, the PAC fundraising Steering
9	Committee.
10	Q That was specific to the Rehberg
11	campaign?
12	A Yes.
13	Q Is that a meeting that Mr. Ziebart
14	would have been responsible for organizing?
15	A Yes, uh-huh.
16	Q Did you attend that meeting with
17	Mr. Rehberg?
18	A I could have. I do not specifically
19	recall. I went to a variety of them during the
20	campaign season. They're all fairly much the
21	same.

Do you remember some of the people

Q

2	A Robert Harrisburg, Jack Ramirez, I
3	believe Cy Jamison.
4	Q Was Senator Conrad Burns on it?
5	A Senators don't serve on PAC steering
6	committees. They often come and attend, speak.
7	Obviously, when you're doing a race,
8	in a senator's home state, you want them to
9	give their perspective on the race and the
10	situation. Not to my knowledge was he ever
11	listed as a member of the steering committee.
12	It would be very unusual.
13	Q What would be the reason for it being
14	held at the NRSC?
15	A One of the resources. The Senatorial
16	Committee makes available, to our candidates,
17	the use of their facilities to hold meetings,
18	meet and greets, that sort of thing.
19	Q Then, on the same day as the Steering
20	Committee meeting, October 23rd, back on the
21	first page, down at the bottom, it refers to a

who were on the steering committee?

5:30 p.m. PAC fundraiser at Cy and Linda

1	Jamison's.
2	Is this a fundraiser that your firm
3	would have organized?
4	A No. Geoff Ziebart had the
5	responsibility for this. We assisted.
6	Q This was a private home, correct?
7	A Yes.
8	MR. CACCIA: Can we go off the record
9	for a minute?
10	MS. WEISSENBORN: Yes.
11	(Discussion off the record)
12	(Lee Deposition Exhibit No. 6
13	was marked for identification.)
14	BY MS. WEISSENBORN:
15	Q Do you recognize this press release?
16	A It's a press release from NRSC in
17	terms of the specifics. We received a variety
18	of press releases from the NRSC through our
19	fax, and this was obviously one of them. This
20	one specifically, I don't have any specific
21	recollection of.

It's dated October the 19th of '95.

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Down	where	the	parenthesis	are,	there	is	talk
about	t poss:	ible	ad targets.				

I believe earlier you testified about the fact that you had a discussion, I believe it was with Joanne Barnhardt, about an upcoming ad campaign.

Was that about the same time as this press release came out?

A That conversation with Joanne was after this time frame. It was after my trip to Montana, which was sometime in late October. So my conversation with her would have been in late October to sometime in November.

Q Was your conversation triggered at all by this press release?

A This informed us that they were looking at doing ad campaigns, yes.

Q When you received it, did you make contact or have a discussion with anyone at the NRSC about this, prior to your conversation later with Joanne or --

A No. I don't recall any specific

1	conversation.
2	Q To your knowledge, did Mr. Rehberg
3	discuss this press release with anyone at the
4	NRSC?
5	A I have no knowledge of that.
6	(Lee Deposition Exhibit No. 7
7	was marked for identification.)
8	BY MS. WEISSENBORN:
9	Q This is a calendar for March 18th
10	through 24, 1996, which again we received via
11	the Rehberg campaign.
12	Under Thursday, March 21st, it shows
13	a meeting DR at NRSC meeting, at the NRSC
14	starting at 10:00.
15	First of all, do you remember
16	Mr. Rehberg coming to Washington at this
17	period?
18	A I don't remember this specific trip.
19	Q Do you remember him having meetings
20	at the NRSC on or about that date, March the
21	21st?

When Denny Rehberg was in town, he

A

1	would go by and visit with the people at NRSC.
2	He came several times during the campaign. I
3	don't have a specific recollection of this trip
4	at this time frame.
5	Q So, I assume, you did not accompany
6	him at this meeting?
7	A Not at these meetings, no.
8	Q Do you remember him talking to you
9	about the results of, not necessarily this
10	meeting, but, meetings in that period of time,
11	in the spring of '96?
12	This includes people he had met or
13	things he had talked about at the NRSC?
14	A Any time that he was in town, and if
15	we were in town at the same time, at some point
16	during his schedule we would have lunch or
17	dinner and we would share information back and
18	forth. I don't have any specific recollection
19	of this trip.
20	Q During this time frame, in the spring

of '96, did he ever discuss with you or tell

you about discussions he had had with NRSC

21

1	representatives involving advertising that
2	they're planning to do in Montana?
3	A I don't recall any conversations with
4	Denny about that, no.
5	Q In the spring of '96, do you remember
6	hearing that any of his campaign officials or
7	representatives had had discussions with the
8	NRSC about advertising?
9	A I do not recall any more
10	conversations.
11	Q The last item on that calendar under
12	the 21st of March says. *Senatorial Committee
12 13	the 21st of March says. *Senatorial Committee one-on-ones.* What is a *one-on-one*?
13	one-on-ones." What is a "one-on-one"?
13 14	one-on-ones." What is a "one-on-one"? A "One-on-one" is, I meet with you, one
13 14 15	one-on-ones." What is a "one-on-one"? A "One-on-one" is, I meet with you, one on one.
13 14 15 16	one-on-ones." What is a "one-on-one"? A "One-on-one" is, I meet with you, one on one. Q With representatives of the NRSC?
13 14 15 16	one-on-ones." What is a "one-on-one"? A "One-on-one" is, I meet with you, one on one. Q With representatives of the NRSC? A I don't know who that's referring to.
13 14 15 16 17	one-on-ones. What is a "one-on-one"? A "One-on-one" is, I meet with you, one on one. Q With representatives of the NRSC? A I don't know who that's referring to. It says at the Senatorial Committee. If it
13 14 15 16 17 18	one-on-ones." What is a "one-on-one"? A "One-on-one" is, I meet with you, one on one. Q With representatives of the NRSC? A I don't know who that's referring to. It says at the Senatorial Committee. If it follows the other format I don't know the

1	Does that mean that your firm would
2	probably have not have been involved in setting
3	this up?
4	A Again, we were support. When they
5	had a schedule, it was Mike Piper, obviously,
6	who is the one who arranged those, who was the
7	campaign manager.
8	(Lee Deposition Exhibit No. 8
9	was marked for identification.)
LO	BY MS. WEISSENBORN:
11	Q I'm going to go through a series of
12	these ads. At some point we may combine a
13	group of them. But just to begin, let's do
L 4	them one by one.
L 5	Do you recognize this NRSC news
16	release dated April 16, 1996?
١7	A I recognize it as the kind of news
L 8	release that they did over a variety of things
L 9	they were doing, not this one specifically.
20	Q Up at the top, it is apparently fax
21	information showing it came to you.

Is that correct?

21

1	A Yes.
2	Q On that date. I believe you said
3	earlier that you had received these as a matter
4	of course.
5	Is that correct?
6	A Uh-huh.
7	Q The second and third page apparently
8	involves issues.
9	Could you explain what this, the
10	second and third pages?
11	A Well, I did not prepare this
12	document. But based upon what is here, this is
13	the standard documentation package that you do
14	when you are providing documentation for an ad.
15	It takes the issues that are raised in the
16	script of the ad and then ties each phrase to
17	whatever documentation was used.
18	Q Prior to this ad being placed, were
19	you sent or telephoned the script for this?
20	A No.
21	Q Did you have any prior knowledge of

what the script was going to be?

1	A No.
2	Q To your knowledge, did Mr. Rehberg
3	have any prior knowledge as to what the content
4	was going to be?
5	A No.
6	Q Did anyone on his committee staff?
7	A No.
8	Q Did you, or anyone at your company,
9	have prior information that an ad involving the
10	subject matter was going to be broadcast?
11	A No.
12	Q Beginning on the 16th. Did you say
13	that you recognized this ad as such?
14	A I recognized the format. These are
15	the ads they ran. I did not recall the exact
16	script, no.
17	Q You did remember the one that they
18	were going to do being on term limits.
19	Is that correct?
20	A No.
21	Q You did not know that. I know this
22	is redundant and it's going to be more so

1	later, but did you
2	MR. CACCIA: Let's see if we can
3	avoid that.
4	MS. WEISSENBORN: Let's just do a
5	couple and then we'll bunch them together.
6	BY MS. WEISSENBORN:
7	Q Did you discuss the placement of this
8	ad?
9	A No.
10	Q Or the time with the NRSC?
11	A No. I had no involvement with any of
12	the NRSC ads.
13	MS. WEISSENBORN: Let's go off just a
14	second.
15	(Discussion off the record)
16	(Lee Deposition Exhibit No. 9
17	was marked for identification.)
18	BY MS. WEISSENBORN:
19	Q This next exhibit is another press
20	release of an NRSC ad dated April the 25th,
21	1996. The ad is entitled "GOP ads, Baucus
22	should back balanced budget on senate floor."

1	Do you re	cognize this press release?
2	A This is a	press release that refers
3	to the ad about Bau	cus' voting for the alpine
4	slide and casino in	Connecticut.
5	Q Did you p	ersonally have any prior
6	knowledge that this	ad was going to be
7	broadcast?	
8	A I did not	
9	Q Had you b	een given an opportunity to
LO	comment on the cont	ent prior to its being
L1	A I did not	•
L 2	Q Did you h	ave any knowledge of when it
L3	was going to come of	ut?
L 4	A No.	
L 5	Q Did you h	ave any knowledge of what
16	stations it was goi	ng to be placed on?
L 7	A No.	
L 8	Q To your k	nowledge, did anyone in the
19	Rehberg campaign kr	ow that this ad was going to
2 0	be aired?	
21	A No.	
22	O What was	the reaction of your firm to

1	this ad when you learned about it?
2	MR. CACCIA: Let's start with her
3	reaction.
4	THE WITNESS: My reaction, when we
5	were made aware that and I don't recall
6	whether it was Senator Baucus' campaign or
7	others in Montana the press, or whoever it
8	was, drew attention to that fact was that this
9	was erroneous. We were very concerned because
10	putting out false advertising is very, very
11	damaging. Mr. Baucus, when he did it, he did
12	with all of the senatorial ads, he attacked
13	Denny Rehberg for the ads, not the Senatorial
14	Campaign Committee.
15	MR. CACCIA: I think we were off the
16	record when we talked about this being
17	erroneous.
18	Maybe you want to ask her what it was
19	that she felt was erroneous about.
20	BY MS. WEISSENBORN:
21	Q What was erroneous about this ad?

It was drawn to our attention that

Α

1	the content of this ad, specifically the alpine
2	slide in Puerto Rico and casino in Connecticut,
3	were things that Mr. Baucus had not voted for.
4	Q Did you contact the NRSC about this
5	ad after it came out?
6	A Yes, we did.
7	Q What was the conversation that you
8	had?
9	A We basically asked them what they
10	were going to do to fix it because we were
11	being killed by it. Mr. Baucus had attacked
12	Denny for telling lies and for placing the
13	responsibility of the ad on him which was not
14	true. It was, it gave Baucus an opportunity to
15	question Denny's integrity.
16	Q What was the NRSC's response?
17	A Shrugged their shoulders, so what.
18	Q Who did you talk to at the NRSC?
19	A Phil Griffith, Griffin, whichever.
20	O Was there ever any correction done?

Not to my knowledge.

MR. CACCIA: You mean by the

Α

21

1	committee.					
2	BY MS. WEISSENBORN:					
3	Q I mean by the NRSC.					
4	A No. It wasn't our ad. But to our					
5	knowledge, they never did anything about it.					
6	Q From the Rehberg committee side, did					
7	you take any action to do anything publicly to					
8	rectify this?					
9	A Ask the question again, I'm sorry.					
10	Q The Rehberg's committee side, did the					
11	committee, or you representing them, take any					
12	actions after this ad to, in public, rectify					
13	the situation?					
14	A The Rehberg campaign responded					
15	through the press to Mr. Baucus' attack on the					
16	Rehberg campaign.					
17	Q What form did that take? Press					
18	releases?					
19	A A press release and I'm sure calls by					
20	the press secretary to the press.					
21	MS. WEISSENBORN: Why don't we take a					
22	break for a moment.					

1	(Recess)					
2	(Lee Deposition Exhibit No. 10					
3	was marked for identification.)					
4	BY MS. WEISSENBORN:					
5	Q Do you recognize Exhibit 10?					
6	A Yes, I do.					
7	Q Before we talk about it specifically,					
8	just in terms of Exhibit 9, the ad, we talked					
9	about it in terms of your reaction to that					
10	particular ad.					
11	What was the reaction of the Rehberg					
12	committee to that?					
13	A The entire campaign, whether it was a					
14	candidate, his spouse, his staff, I mean, this					
15	was a major problem because of the way					
16	Mr. Baucus responded to it, calling Denny					
17	guilty of saying that he was lying. In fact,					
18	they used this very, the response that they					
19	started with this, in the very closing days of					
20	the campaign which was part of Denny's loss.					
21	We didn't know this at the time, but					

it was very -- it was a major, major event

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1	because of the attack that Baucus leveled on
2	us. As I recall, I don't remember specifics,
3	but I believe in addition to the press attacks,
4	that he also did a paid response as well.
5	Q He meaning?
6	A Baucus.
7	Q Exhibit 10, the memorandum to the

Rehberg campaign from you dated April 30, 1996, could you just summarize what the purpose of that memorandum was? What inspired it?

The purpose of this memorandum, to the Rehberg team, was to suggest a response of dealing with the attack that we were getting from Max Baucus in response to the Senatorial Committee's erroneous ad.

Q When you talk about the guilty charge, what does "quilty" refer to?

Baucus' response. As I said, I believe there was paid radio as well, a paid component, as well as press, in that he said that Denny was guilty and just laid it out.

So what we were looking to do was to

have some	respond in kind. You're getting mud
thrown at	you, you go back with the same kind
of charge	so that you can level the playing
field, or	at least get everybody confused of
what the c	situation is

Q What, in fact, did the Rehberg committee finally decide to do?

A We did not have the money. One of the things that you do when you decide strategy is when do you use your resources. This was a little over a month before our primary. We had what appeared to be a wealthy primary candidate running against us. We were not willing to squander our resources in a fight with Baucus that we had not started.

We didn't have the resources to fight that fight at the same time we were fighting the primary fight. So our response was through the press.

Q Next I would like to introduce a series of exhibits, all of which are either radio or television ads. We'll number them one

1	by one, but we'll talk about them as a group
2	after you've looked at them.
3	(Lee Deposition Exhibit No. 11
4	through 15 were marked for
5	identification.)
6	BY MS. WEISSENBORN:
7	Q As far as Exhibits 11, 12, and 14 are
8	concerned, which, at least the first pages, are
9	press releases?
10	MR. CACCIA: 11, 12 and 14?
11	MS. WEISSENBORN: 14, right. 15.
12	MR. CACCIA: Just real quick, for the
13	record, Exhibit 15 is a one-page document and
14	Exhibit 14 is a one-page document. Exhibit 12
15	is a two-page document, Exhibit 11 is a
16	five-page document and Exhibit 13 is a one-page
17	document.
18	THE WITNESS: Which we're not dealing
19	with at this moment.
20	BY MS. WEISSENBORN:
21	Q The first pages of Exhibits 11, 12,
22	14 and 15, do you recognize those as being NRSC

2	A These are NRSC press releases, yes.						
3	Q Do you recognize the ads that they						
4	are addressing?						
5	A They are, in terms of specifics, I						
6	don't recall the exact ads, but they're the						
7	format that we received during that time						
8	period, the spring of '96.						
9	Q Exhibit 13, which is the odd one						
10	there, this is a script for the video portion						
11	of an ad.						
12	Do you know if that ever ran?						
13	A I have no idea.						
14	Q I was just wondering why there's no						
15	press release. So it may not have. For the						
16	ones that have press releases, only the first						
17	one has backup research attached.						
18	Do you remember always receiving						
19	backup for each one, or did that become less						
20	and less important as it went along?						
21	A I don't recall what documentation						

press releases?

they put.

1	Q Did you, or your firm, have any prior					
2	knowledge as to the content of the ads in these					
3	exhibits before they were run?					
4	A They did not. We did not.					
5	Q Did you have any prior knowledge as					
6	to the fact that they were going to be aired?					
7	A We did not.					
8	Q In regards to the timing, did you					
9	have any prior knowledge as to what stations					
L 0	they were going to be placed on?					
11	A We did not.					
12	Q To your knowledge, did anyone in the					
13	Rehberg campaign have prior knowledge as to the					
L 4	content of these ads before they were shown?					
15	A No.					
16	Q Did they have any knowledge as to the					
17	timing of the ads?					
1.8	A Not to my knowledge.					
19	Q To your knowledge, did they have any					
20	prior knowledge as to the placement stations?					
21	A No.					
22	MR. CACCIA: Are you going to be done					

1	with that group, Ms. Weissenborn?
2	MS. WEISSENBORN: Yes.
3	(Lee Deposition Exhibit No. 16
4	was marked for identification.)
5	BY MS. WEISSENBORN:
6	Q Do you recognize this document?
7	A Yes, I do. This is a memo that I
8	wrote to the campaign press secretary, Steve
9	McCarter.
10	Q Dated June 7, '96?
11	A Correct.
12	Q What inspired this memo?
13	A I don't recall the specific medium of
14	the attack. But there was an ongoing attack
15	which started at the time that the first
16	erroneous Senatorial Committee ad ran of Max
17	continuing to attack Dennis Rehberg about the
18	Senatorial Committee's advertising and the
19	content of that and blaming, saying that Denny
20	was guilty and that he was lying.
21	So I don't remember the specifics,
22	but this was a suggestion to the press

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1	secretary	οf	how	to	handle	the	issue.

Q Were any of the other ads that you remember erroneous in their content, like the one that we talked about, the casino ad. Any of the later ones as erroneous as that?

A Not factually erroneous. That they were appropriate is a different subject. But that was the primary factual error that I recall.

Q You indicate that they may or may not have been appropriate.

What do you mean by that?

A I believe, and many of the campaign team believe, that because of the errors that they had, in the original advertising, it allowed Baucus to go on a very negative attack against Denny, which was detrimental to the campaign.

Q With regard to the ads after the one involving the casino accusation, did you have any discussions with individuals at the NRSC about their campaign, their ad campaign?

1	A Their ad campaign?
2	Q Yes.
3	A Regarding the ads we've discussed
4	here?
5	Q Yes.
6	A After that lack of response, I don't
7	recall any specific conversations. It was not
8	a pleasant relationship at that moment.
9	Q Did you ever call Joanne Barnhardt
10	and say, please stop these ads completely?
11	A I don't recall that specific
12	conversation. I know that we felt very
13	strongly that they that effort was allowing
14	Baucus to continue to attack Denny because
15	every time they put up an ad, he then would put
16	up either advertising or press boards.
17	United States senators can do so with
18	great power and great communications and attack
19	Denny for lying and being guilty.
20	Q But in terms of your relationship
21	with the NRSC, were there any requests made by

Mr. Rehberg, or anyone connected with the

campaign of the NRSC, to cease or assist or whatever you might say?

A Well, we had no capacity to get them to do anything. That was, you know, obviously, from the point that they wouldn't even deal with the fact when they made a mistake. They were on their own agenda. So we probably were not in a position of trying to beat a dead horse.

Q So as far as you can remember, in terms of direct relationship with the NRSC, there was no communication beyond you're talk with Mr. Griffin about the earlier --

A No. I wouldn't say there was no communications with the campaign. The Senatorial Committee is responsible to elect republicans to the US senate. They have resources. They control, by virtue of their promotion or detraction from your campaign, the out of state money that comes to a campaign. Control is too strong a word. They have a great impact as to whether or not people

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.	perceive	vour	race	as	a	winning	race.

So we obviously were not going to cut off our nose to spite our face. So we had ongoing communication with them in terms of the media campaign. It had not been a fruitful relationship.

Q Your ongoing communications were about what subjects?

A Whatever was happening in the campaign. I mean, they do briefings, on an ongoing basis to the PAC community, to donors. We were still, at this point, trying to get the research package that was promised for almost a year at this point.

If we were doing a PAC fundraiser or something like that, we would make them aware of it so they would support and make people aware of it.

You have an ongoing relationship
because they still had not spent the
coordinated expenditure on our behalf. They
had the capacity to make a big impact, as they

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made	stat	emen	its	that	, ag	ain,	were	e no	ot 1	Eastu	ıal
and	hurt	our	fun	drai	sing	gre	atly	to	108	sing	the
camp	aign.										

Q In terms of the timing, everything we've looked at so far has been preprimary, right?

A Right. That is correct.

Q Is it correct that, in terms of the ads themselves, following your discussion with Mr. Griffin, you did not say, please stop these ads?

A During this time frame, after the primary and after we saw our survey research, in one of our ongoing conversations with them, we explained to them what we saw was a very defined negative impact. That the outside advertising had happened because we had run a very small bio positive advertising. The only thing that had been on the air had been what they had done.

So the changes in our survey numbers,

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att	ribu	ıtable	e to	son	ne o	uts	side	forc	e.	Since	we
had	in't	done	anyt	hir	ıg,	we	beli	eved	sti	congly	that
it	was	harmi	Eul t	o t	he	can	npaic	n.			

Q Do you remember about when that happened?

A It would have been immediately after the primary. Because after you go, contested primary you don't do, when it's a noncontested primary. But when it's a contested primary, you go immediately into the field with survey research, if you can afford it, to see what your standing is. You're now -- up until that point your focus is your primary candidate.

Ours had spent a hundred thousand dollars in the month of May, which is real money in Montana. So this research, which covered that period, would have been in people's recollection immediately prior to the primary to give us then the direction of where we stood to go into the general election.

Q The primary election was early June;

1	is that correct?
2	A Early June, that's correct.
3	(Lee Deposition Exhibit No. 17
4	was marked for identification.)
5	BY MS. WEISSENBORN:
6	Q This exhibit is another press release
7	dated June 21, 1996, and therefore after the
8	primary. Do you recognize this press release?
9	A I recognize it as the Senatorial
10	Campaign Committee's press release, not the
11	specifics of it.
12	Q Do you remember there being a
13	television ad aired around that time?
14	A Yes.
15	Q What was your reaction to this
16	particular ad?
17	A This ad reflected a theme that the
18	Senatorial Committee used a cookie cutter
19	approach in several campaigns. It focused on
20	the word liberal and tagged Max Baucus, as well
21	as other states wherever they ran it, as

liberals. Again it was, I believe there's not

1	a disclaimer on this, so I assume that this
2	was, well, it says, it discusses NRSC TV ad,
3	okay.
4	We, within the campaign, did not feel
5	it was anything that was helpful because Max
6	Baucus wasn't seen as a liberal in Montana.
7	Q So you did not view this as a
8	positive element of the campaign?
9	A Again, in terms of, you know, what
10	the Senatorial Committee was doing, we didn't
11	think that it was anything that was believable
12	to the voters of Montana.
13	(Lee Deposition Exhibit No. 18
14	was marked for identification.)
15	BY MS. WEISSENBORN:
16	Q Do you recognize this document?
17	A This is a draft letter that we, as
18	well as others in the campaign, worked on to go
19	to Max Baucus. After a week's worth of back
20	and forth following the first debate, following
21	the primary, that we had with Max Baucus.

Dennis Rehberg had offered a clean campaign

pledge to the other two candidates in the race,
that was an independent race, as well as
Mr. Baucus.
Q He offered that during the debate?
A Yes, he did. Neither the
candidates you're not supposed to do
anything spontaneous behind the podium
signed it at the time. The independent
candidate did the following Tuesday.
Approximately a week later Mr. Baucus did.
Q In a nutshell, what did the clean
campaign pledge say?
A It basically reiterated, as we do in
all campaigns, but Denny was putting in
writing, that any charges would be documented
and factual. If you were attacking the other
candidate, you would do so in your own voice
rather than using a service or NRSC.
Q This is a draft of a letter. Was a
final letter actually sent?
A Yes, it was.

It was pretty much the same as this?

Q

	7	7	I	don't	know	whi	ch	draft	t	his	Wa	ıs,
but	I	woul	ld	assume	it	was	clo	se.	1	don'	t	have
a di	ire	ect 1	cec	call.								

- Q I have one follow-up question and then a couple of summary questions.
 - A Sure.
- Q Going back to the fall of '95, you stated, I believe, with regard to Exhibit 6, which was the press release that announced in October the NRSC's upcoming ad campaign, that you remembered that. Then later, I believe you said in November, correct me if I'm wrong, that you had a conversation with Joanne Barnhardt about the upcoming advertising campaign.

I know this maybe be repetitious, but repeat what you remember about your conversation with her.

A This was either a phone call or perhaps a face to face meeting, I don't recall. Kind of -- we had a meeting in Montana. I was giving her an update on what we were doing, continuing to look for the research package

they had promised us. We had been made aware
of their intention to do ad campaigning in
Montana. She had stated to me that there was
\$35,000 that was going to be put towards that
campaign and that that could possibly be more
than \$35,000.
Q Again, did she talk at all about wh

Q Again, did she talk at all about what issues they were going to cover in this these ads?

A I don't recall any specific content.

Obviously, this relates that I would have seen it a couple of weeks before, talked about taxes and other economic issues, so I probably went into that meeting with that kind of assumption. I don't recall any specific discussion of anything having to do with content.

Q Again, did she tell you approximately when they were going to start this campaign?

A No.

Q Did she talk about emphasizing particular parts of the state or particular stations or anything like that?

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Q Were there any other discussions that you had with Joanne Barnhardt, or anyone else at the NRSC, following those fall discussions about the ad campaign that they were planning for Montana?

A The only other specific discussions were primarily centered around was it ever going to happen. I know that there were conversations about -- from the state party chairman of great frustration. They had been told by Joanne that it was going to happen. It wasn't happening.

So there was discussions regarding the lack of, as opposed to any specifics.

After a certain amount of months you kind of figure it was one more thing that was intended but hadn't happened.

Q So when it finally did, were you surprised?

- A Frankly, yes.
- Q These discussions with the party were

1 early '96	1		- 1		е	a	r	Ţ	V	•	9	6	•
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A Uh-huh, early '96. It was cold, and we had a blizzard in D.C., so that was probably January.

Q This is probably repetitious, but before these ads ran, were you, and we'll start with you, ever asked for any input into the issues that they might address, they being the NRSC, in their ad campaign in Montana?

A No, I was not.

Q To your knowledge, was anyone in the Rehberg campaign asked for input on issues to raise in the ads?

A Not to my knowledge.

Q Were you or anyone else at your company ever asked for input as to preferable timing of an ad campaign in Montana by the NRSC?

A No.

Q To your knowledge, was anyone in the Rehberg campaign ever asked for input about timing of these ads?

1	A Not to my knowledge.
2	Q Lastly, were you, or anyone at your
3	company, ever asked for input as to the best
4	placement of such ads in Montana?
5	A No, we were not.
6	Q To your knowledge, was anyone at the
7	Rehberg campaign ever asked for input as to
8	placement of NRSC ads in Montana?
9	A Not to my knowledge.
10	Q One thing I want to clarify, and I
11	don't want to beat a dead horse
12	MR. CACCIA: Too late.
13	BY MS. BUMGARNER:
14	Q You had stated you had talked with
15	Mr. Griffin after the casino ad ran to talk
16	about your being unhappy with it. Then you
17	mentioned immediately after the primary that
18	there were other contacts of a similar nature.
19	I guess my question is, was anything
20	ever done, even though you appeared to make a
21	continuing objection to these ads, by the NRSC?

There was never any change

Α

1	unfortunately.		
2	MS. WEISSENBORN: Do you have any		
3	questions?		
4	MR. CACCIA: If you would, I'm going		
5	to ask you all to excuse us for a second. I		
6	don't anticipate having anything.		
7	(Recess)		
8	MR. CACCIA: I have no questions.		
9	MS. WEISSENBORN: It's our policy not		
10	to close a deposition but to leave it open just		
11	in case. It's highly unlikely that we would		
12	bother you again, but just in case.		
13	Our other procedure is that the		
14	deposition will be available at the reporter's		
15	office should you wish to review it and sign		
16	it. That's up to you. But you'll be notified		
17	when it's ready.		
18	It's adjourned.		
19	(Whereupon, at 12:40 p.m., the		
20	deposition of LADONNA Y. LEE was		
21	adjourned.)		

. 22

1	CERTIFICATE OF SHORTHAND REPORTER - NOTARY PUBLIC
2	I, Ginger Marie Brewster, the officer before whom the
3	foregoing deposition was taken, do hereby certify that
4	the foregoing transcript is a true and correct record
5	of the testimony given; that said testimony was taken
6	by me stenographically and thereafter reduced to
7	typewriting under my supervision; and that I am neither
8	counsel for, related to, nor employed by any of the
9	parties to this case and have no interest, financial or
L 0	otherwise, in its outcome.
l 1	IN WITNESS WHEREOF, I have hereunto set my
12	hand and affixed my notarial seal this day of,
L 3	11 xrembra 1997.
L 4	
l 5	My commission expires: October 31, 1999
l 6	
l 7	
LB /	Jugu have Brewster
19	NOTARY PUBLIC IN AND FOR
2 0	THE COMMONWEALTH OF VIRGINIA
2 1	

THE RESERVE THE PARTY OF THE PA

CONFIDENTIALITY ADVISEMENT

Since this information is being sought as part of an investigation being conducted by the Federal Election Commission, the confidentiality provisions of 2 U.S.C. § 437g(a)(12)(A) apply. This section prohibits making public any investigation conducted by the Federal Election Commission without the express written consent of the person under investigation. You are advised that no such consent has been given in this case.

let effe	11/13/97
(Signature)	(Date)
Ladonne Ylee	(Date of Birth)
(Print Full Name)	(Date of Birth)
Nor Lovioso (Social Security Number)	203-842-4100
(Social Security Number)	(Telephone Number)
900 JUS Sr. NE Suive	200 WSC 2000Z
(Address including Street, City, State, an	d Zip Code)



DEPOSITION EXHIBIT 2

Denny Rehberg Sunday ~ July 16th

9:00 am

5:30 pm

Noy



12:30 pm -

2:00 pm -

3:00 pm -

3:30 pm -

5:30 pm -

Meeting with Senator Alfonse D'Amato

(ph)202-224-6542 (Hart)

Contact: Beth Walker (@ NRSC = (ph)202-675-6036)

Denny Rehberg Tuesday ~ July 18th



9:00 am - NRSC Meeting with John Heubusch (Executive Director)

425 2nd St., NE (ph)202-675-6000

20002

Contact: Wes Anderson

9:15 am - Meeting w/ Wes Anderson (MT Rep, Coalitions Director)

Ed Rahall (PAC Director)

Gordon Hensley (Communications)

JoAnn Barnhardt (Political Services Director)

Greg Striple (Polling)

Precilla Russo (Financial Services)

at NRSC - for presentation on Op-research

425 2nd St., NE

(ph) 202-675-6000

Contact: Wes Anderson



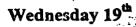
Tuesday ~ July 18th 12 - 1:30 pm 2:45 pm -3:15 pm -4:00 pm -Water State of the 5:00 pm -7:00 pm

11:30 am -

12:00 pm -

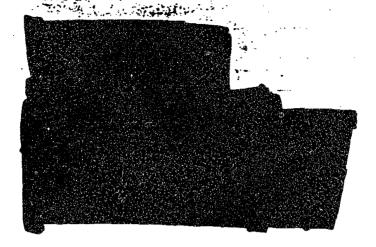
2:00 am -

3:30 pm -



5:00 pm -

6:30 pm -





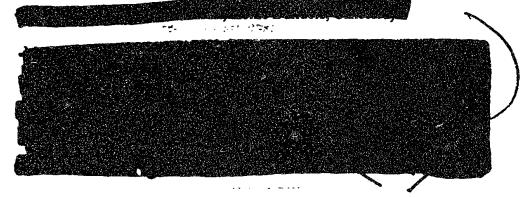
Thursday ~ July 20th

9:30 am -



10:30 am -

11:45 am -



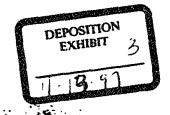
1:45 pm -



2:15 pm -



3:00pm -



THE EDDIE MAHE COMPANY

To:

Geoff Ziebart

From:

Ashley Jordan

Date:

September 19, 1995

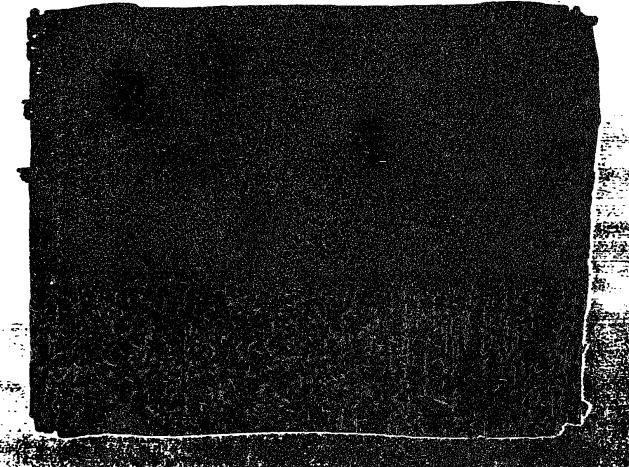
Subject:

PAC Event and other things of importance

CC: Denny Rehberg, Jan Rehberg, Will Brooke, Tony Payton and Ladonna Lee

Per our discussion, enclosed is Denny's schedule during his last visit to Washington. All the appointments were either set up by Robert Arensberg, Wes Anderson of the NRSC or me, so if you have any questions, just let me know.

A few things:



• Finally, I'd like to set up a meeting with Priscilla Ruzzo of the NRSC (she's the PAC person) and lets figure out what they are willing to do for Denny on their end. Also, lets schedule a conference call this week with Jack Ramirez and Robert Arensberg. I'll set it up.

3.44.7

TO:

Rehberg Team

FROM:

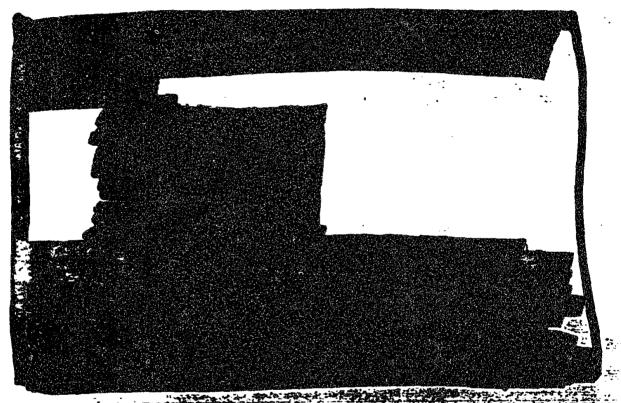
Ladonna Y. Lee

RE:

Update

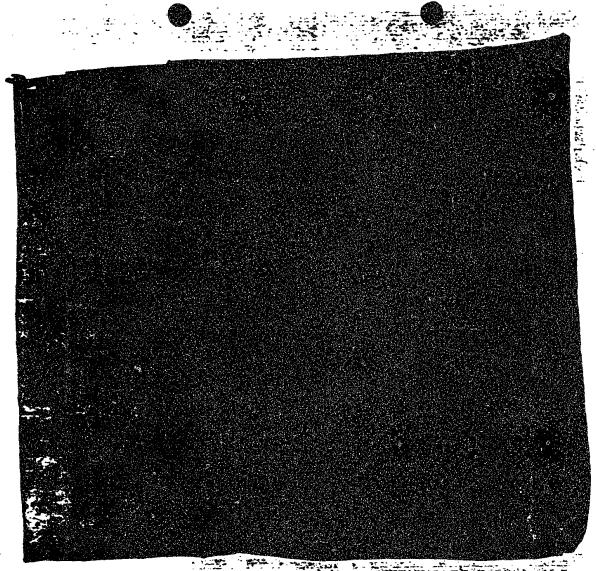
Following is a brief recap of our meeting in Montana on Sunday as well as conversations with the NRSC, etc.

Fundraising



All members of the Century Club and other key leaders in the Rehberge team should be invited to a Christmas open house keyed to geography. This is not a but will give the Century Club members motivation to meet their goal by the time of the event(s). The two weeks leading in to these events might be a good time for the NRSC staff person to assist Stan. (Joanne agreed she could as well as assisting on the Denver event)

Raucus



For each of these areas, we need the facts, DR's record, Max Baucus record and any vignettes to describe DR's position.

This research needs to be complemented by the other requests to the NRSC to complete the Baucus research for his entire legislative history (see research memo)



Joanne Barnhart has said Bob Potts will undertake the rest of our research and she is determining when he can produce product based on his other assignments.

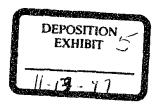
NRSC

Ladonna will undertake the "care and feeding" and communication with the NRSC. DR will communicate regularly with Highbush and JoAnne. I met with Joanne for lunch. She will work with us to get Denny invited to the Senatorial Trust events so he can begin working on major donors around the country.

State Party

The party is going to undertake a message program showing MB out of touch w/Montana. Our recommendation is a series of radio ads starting ASAP telling MT that Max has already voted against their cut in taxes, reducing government, etc. The message will then be adapted depending upon the news cycle. JoAnne said they have \$35,000 to begin the program with and could spend over \$100,000 between now and the beginning of the year.

Rehberg Schedule



SATURDAY - OCTOBER 21

9:00am -

SUNDAY - OCTOBER 22

6:00pm

MONDAY - OCTOBER 23

9:30am - 10:00am

1:15pm - 1:50pm

2:00pm - 2:30pm

2:30pm - 3:00pm Builders

6:00pm - 7:00pm

TUESDAY - OCTOBER 23

9:30am -10:00am

10:30am

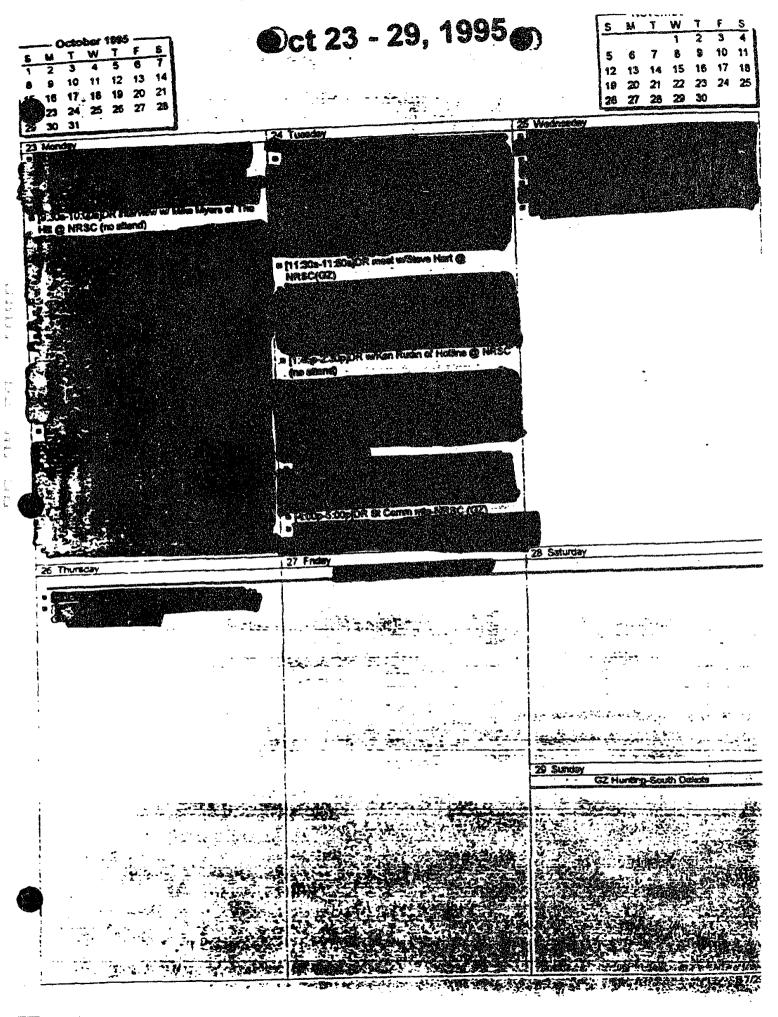
12:00pm - 1:30pm

1:45pm - 2:30pm

3:00pm

4:00pm - 5:00pm - Steering Committee Meeting (Provide list tomorrow)

5:30pm - 7:30pm PAC Fundraiser @ Cy and Linda Jamison



Double Cuty The lieutenant governor visits D.C. to attend a conference and raise funds for his Senate bid

BY CHARLES S. JOHNSON Miccourier Stelle Bureau

HELLINA - Republicas LL Gov. Dennis Reliber, a in Weshington. D.C. early this week are security of the second of turing : . oney for his 1996 campaign for the U.S. Senate was held by Democrat Mass Baucias.

Rehberg said leaders of the National Francisco of Independent Basiness personally to sessioned grid com set being or our being what he land is Bauchai poor record is ಮಾರ್ಡಿ ಬಿಡಬಾದ ಬ್ಯಾಂಗಾಗಿಗೆ ಕಾಡು! ಶಿವನಾಡು The federation has more than 9,000 members in Montae :

The cop to West ingrow is being paid for urth by his company and burned. Rehberg

As an elected off-coal. Reforing bas so vacabon (unc. But as Levicasm) governor. Renberg said he bas put in plenty of 50- and 60hour weeks and worked lots weekends, so he sees no problem with his making the trip, despite Democratic ***any** ຕາຍເໝລະ

No Jody has ever accused Dennis Rehberg of act putting in a day's work and a day's pay," be said "Fample are getting their money's worth from this heutenant governor."

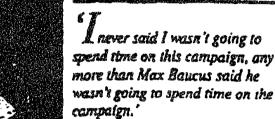
As for Democrats' trifficians of him constraint amoning business on work days. Rebberg said Toerer said ! some t going to spend time on the campaign any more than Man Baucus mad be wrest? going to apoint these on the CHORNI DIL

Retifery said he will campaign, while dill procles to the bours as lautement greenmen, and saled whether Haussia would make a का किर उर्व मध्यमामध्य campaign between our and 1796.

And he expended his candidaty in Kaligral Jame 25, Rethers and the Missouline State Bureau he would confine the companying to off bours on nights and weekends, and would accornic the detail and the expenses. He said then he hopes Bauers will do the same.

Suite Decrocrace Chairman Kelly Addy cidered Rebberg, saying the Ecotement greemon "Is constantly breaking his promise to Mountainers and so considerable expens page emblocate to be doing the job they elected him to do.

Rebberg will be bettered at two faced-raising



-LL Gov. Deraits Rabboro

events in Washington. One is a "caset and great hancheon" loday sporsored by James McClure, foreset Republics a season from Idabo, and three other people commond with mining traces. according to Robberg. No price for the event and Sales

The other is a reception tonight at the Washington bome of Cy Jaminos. an unsuccessful candidate for Congress in Montana last year. Sportsoring the event are Sec. Control Burns. R. More, and four other Republican sensions from neighboring states. These is cost \$500 for political serion committees or \$250s for inclinidately.



Particular

18.19.1995 15181

18/19/95 15:18:84 VIA FAX



NRSCNEWS 96

NATIONAL REPUBLICAN SENATORIAL COMMITTE

Chairman, Senator Alfonse D'Amaso

FOR IMMEDIATE RELEASE: THURSDAY, OCTOBER 19, 1995 NRSC95/165 CONTACT: NRSC PRESS OFFICE NANCY IVES 202/675-6006

NRSC GATHERING VIDEO, AUDIO FOOTAGE OF CLINTON TAX COMMENTS

GOP SENATE CAMPAIGN COMMITTEE PREPARING TO USE CLINTON "TAXED TOO MUCH" COMMENT IN 1996 SENATE RACES

Washington, DC - The National Republican Senatorial Committee is today gathering video and audio footage of the President's "raised taxes too much" speech in Houston for use in the 1996 Senate campaigns.

"When President Clinton admitted he raised taxes too much, he left his tax increase supporters in the U.S. Senate twisting in the political wind," said John Henbusch, Executive Director of the National Republican Senatorial Committee. "We plan on letting voters know their Senator supported the Clinton tax increase and, that now, the President said the tax increase was too big."

Possible ad targets include Senators Max Baucus/MT, Paul Wellstone/MN, Carl Levin/MI, John Kerry/MA, Joe Biden/DE and John Rockefeller/WV.

In addition, those in the House of Representatives who backed the Clinton tax increase — and who are now running for the U.S. Senate — are also possible ad targets. They include liberal Representatives Bob Torricelli/NJ, Richard Durbin/IL, Jack Reed/RI and Tim Johnson/SD.

"The Clinton admission that he raised taxes too much has undermined all of the liberals who supported the record-size tax increase," said Heubusch. "We will ensure that voters know their Democrat Senator and Democrat Senate candidates raised taxes too much'. This is a great issue for the GOP because voters always suspected it was true — and now the President himself has confirmed it."

DEPOSITION EXHIBIT

11-14-47

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Ø/lar 18 - 24, 1996

April 1996

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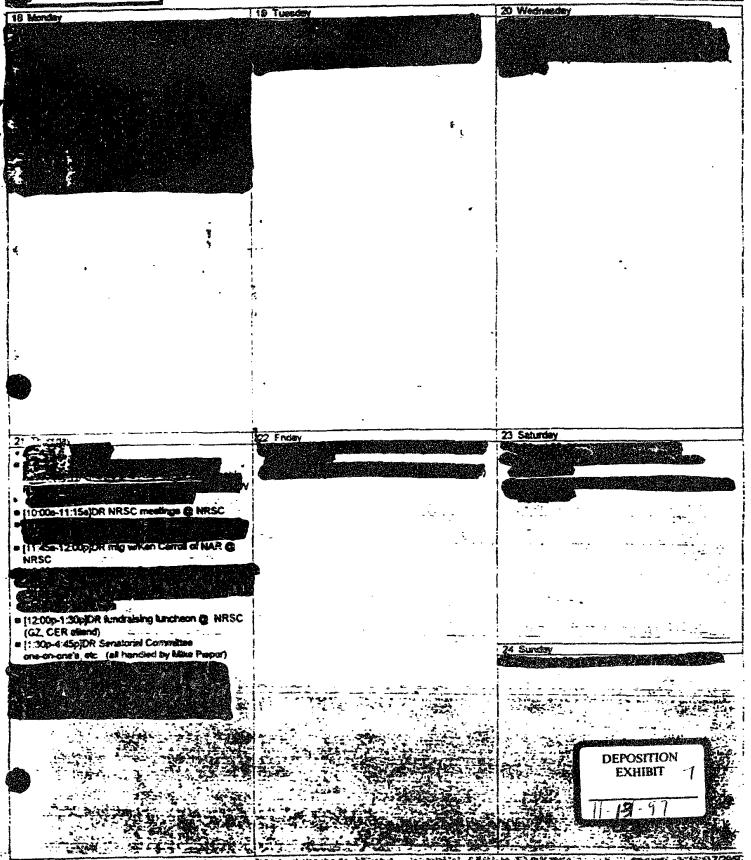
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NRSCNEWS 96

NATIONAL REPUBLICAN SENATORIAL COMMITTEE

Chairman, Senator Alfonse D'Amaro

FOR IMMEDIATE RELEASE: TUESDAY, APRIL 16, 1996 NRSC96/81 CONTACT: NRSC PRESS OFFICE 202/675-6006

NEW GOP ADS: BAUCUS SHOULD HEED MONTANANS ON TERM LIMITS

NRSC COMMENCES MONTANA RADIO CAMPAIGN URGING -BAUCUS TO VOTE FOR TERM LIMITS WHEN MEASURE COMES BEFORE SENATE

Washington, DC – The National Republican Senatorial Committee today commenced a Montana radio campaign urging Senator Max Baucus to heed the wishes of Montanans by voting to support term limits when the measure is considered on the floor of the United States Senate.

The following sixty-second radio spot, produced for the NRSC by River Bank Inc., will air in markets throughout the state of Montana:

"Liberal Max Baucus voted to raise his own pay, then voted to raise our taxes. He was wrong. While working families are having a tough time making ends meet here in Montana, Max Baucus is back in Washington giving himself a big payraise, then voting to raise our taxes.

"Max Baucus increased his pay by more than \$23,000, then increased our taxes by more than \$2,600 per family. That's an outrage. Pay raises... higher taxes. That's not Montana — but it is Max Baucus.

"Soon the Senate will vote on term limits — and the people of Montana support it. But not Max Baucus. In fact, he's already opposed term limits. It's just what you would expect from a Senator who's been in Washington for twenty-one long, liberal years.

"Call liberal Max Baucus. Tell him he was wrong to vote himself a big payraise, then vote to raise our taxes. Tell him it's time to vote for term limits."

See Attached Documentation

DEPOSITION EXHIBIT

· · · · · · · · · · · · · · · · · · ·	
"Baucus voted to raise his own pay,"	 Baucus voted for the amendment to raise senators' pay from \$101,900 to \$125,100. (CQ Vote #133: Adopted 53-45: R 25-18; D 28-27, July 17, 1991.)
"then voted to raise our taxes."	Baucus voted for passage of the Clinton tax Increase Bill bill. (CQ Vote #190: Passed 50-49: R 0-43; D 49-6, with Vice President Al Gore
	casting a "yea" vote, June 25, 1993.)
	Baucus voted for adoption of the conference report. (CQ Vote #247: Adopted 51-50; R 0-44; D 50-6, with Vice President Al Gore casting a "yea" vote, Aug. 6, 1993.)
·	
"Max Baucus increased his pay by more than \$23,000"	Baucus voted for the amendment to raise senators' pay from \$101,900 to \$125,100. (CQ Vote #133; Adopted 53-45; R 25-18; D 28-27, July 17, 1991.)
"then increased our taxes by more than \$2,600 a family."	• The Heritage Foundation, in an April 7, 1994, study entitled "The State and District Impact of The Clinton Tax Increase," calculated that the 1993 Clinton/Baucus tax bill will cost Montana's taxpayers \$541,779,082 over five years, or \$668.04 for every man, woman and child in Montana.
	• (family of four) \$668.04 x 4 = \$2,672.16
"Soon the Senate will vote on term limits.	"The margin of support for the 14
And the people of Montana support it.	initiatives this year demonstrate the
	political potency of term limits:
	Montana, 67 [percent];"
	(Insight Magazine, 11/30/92)

"In fact, he's [Baucus] has opposed term limits."

- "But Baucus said Montana already had term limits before the (term limits] initiative: 'It's called voting."" (The Associated Press, 8/23/93)
- Baucus voted for the motion to table (kill) amendment to limit terms of successful Senate candidates to two consecutive terms if they received public financing. (CQ Vote #69: Motion agreed to 68-30: R 12-30; D 56-0, May 22, 1991.)
- · Baucas voted for the motion to table (kill) the amendment to impose term limits on candidates who receive public financing of six House terms and two Senate terms. Under the amendment, if an individual decided to run for an additional term, the individual would be required to repay all public financing previously received. (CQ Vote #128: Motion agreed to 57-39: R 6-36; D 51-3 May 26, 1993.)
- Baucus has also failed to cosponsor any of the 21 term limit initiatives that have been introduced in the Senate since 1979.



NRSCNEWS 96

NATIONAL REPUBLICAN SENATORIAL COMMITTEE

Chairman, Senator Alfonse D'Amate

FOR IMMEDIATE RELEASE: THURSDAY, APRIL 25, 1996 NRSC96/98 CONTACT: NRSC PRESS OFFICE 202/675-6006

GOP ADS: BAUCUS SHOULD BACK BALANCED BUDGET ON SENATE FLOOR

NRSC COMMENCES MONTANA RADIO CAMPAIGN OUTLINING BAUCUS LIBERAL RECORD OF TAXING AND SPENDING

Washington, DC - The following sixty-second radio spot, produced for the NRSC by River Bank Inc., will begin airing in markets today throughout the state of Montana:

Anner:

You already know that liberal Max Baucus voted to raise his own pay by \$23,000 then voted to raise your taxes by more than \$2,600 a family.

But did you know that in the 21 long liberal years that Baucus has been in Washington, our debt skyrocketed to \$5 trillion.

It's a fact.

And still liberal Max Baucus refuses to consistently vote for a <u>real</u> balanced budget.

Instead, he's voted to spend billions more on wasteful government spending.

That's right. Billions more

Liberal Max Baucus even voted to spend our taxdollars to pay for an alpine slide in Puerto Rico and a casino in Connecticut.

That's not Montana. But it is Max Baucus.

Call liberal Max Baucus at (300) 332-6106. Tell him to stop wasting our hard earned money. Tell him to vote for Congress' balanced budget plan.

Paid for by the National Republican Senatorial Committee.

See Attached 1 Page Documentation

DEPOSITION EXHIBIT Q

1-19-97

AD TEXT

BAUCUS RECORD

Baucus voted to raise his own pay by \$23,000.	Baucus voted for the amendment to raise senators' pay from \$101,900 to \$125,100, ban senators' honoraria and limit outside earned income to 15 percent of a senator's base pay. (CQ Vote #133: Adopted 53-45: R 25-18; D 28-27, July 17, 1991)
Baucus voted for the 1993 Clinton tax bill which raised taxes \$2,600 for a family of four in Montana.	Baucus voted for passage and adoption of the 1993 Clinton tax bill (CQ Votes #190, #247, 1993) Per capita impact of the 1993 Clinton tax bill on Montana was \$668.04. Multiplied by four equals \$2,672.16. ("The State and District Impact of the Clinton Tax Increase," 'Heritage Foundation, 4/7/94)
Baucus has been in Washington 21 years.	Baucus was elected to federal office in 1975. He has spent over 21 years in Washington. (The Almanac of American Politics, 1996)
While in office the national debt skyrocketed to \$5 trillion.	The national debt as of Wednesday, April 17, 1996, was \$5,146,356,518,536.99. (The Washington Times, 4/19/96)
Baucus refuses to vote for a balanced budget.	Baucus voted against both passage and the conference report of FY 1996, a bill to balance the budget by 2002. (CQ Vote #556: Passed 52-47: R 52-1; D 0-46, Oct. 28, 1995) (CQ Vote #584: Motion agreed to 52-47: R 52-1; D 0-46, Nov. 17, 1995)
	Baucus voted three times for measures which / expressed a desire for a goal of balancing the federal budget. (CQ Vote #371: Adopted 61-31: R 39-9; D 22-22, Dec. 11, 1985); (CQ Vote #581: Passed 60-37: R 53-0; D 7-37, Nov. 16, 1995); (CQ Vote #611: Passed 94-0: R 49-0; D 45-0, Dec. 21, 1995)

Baucus refuses to vote for a balanced	Balanced Budget Constitutional Amendment
budget.	•
	Although Max Baucus' rhetoric promotes
	reducing the deficit, his record on the balanced
	budget amendment does not. Baucus has voted
·	against the balanced budget amendment 10
	times out of 13 occasions. The following three
	votes are considered to be the benchmark votes
	on the balanced budget amendment. Baucus
•	voted against it in 1986 and 1994, then flip-
	flopped and voted for it in 1995.
	(CQ Vote #45: Rejected 66-34: R 43-10; D 23-
	24, March 25, 1986); (CQ Vote #48: Rejected
	63-37: R 41-3; D 22-34, March 1, 1994);
	(CQ Vote #98: Rejected 65-35: R 51-2; D 14-
	33, March 2, 1995)
Baucus has voted to spend billions on	The net total of legislation Baucus voted for in
wasteful government spending.	the 103rd Congress was: "\$54,213,000,000"
	(NTUF VoteTally, 103rd Congress, 10/10/94)
	The net total of legislation Baucus voted for in
	the 104th Congress was: "\$41,304,000,000"
	(NTUF VoteTally, 104th Congress, 2/96)
Baucus voted to spend taxdollars on	Baucus supported Clinton's 1993 "stimulus"
an alpine slide in Puerto Rico and a	plan. Specifically, he voted against cutting the
casino in Connecticut.	Community Development Block Grants which
•	would have funded the alpine slide and the
	casino. (CQ Vote #87: Motion agreed to 54-43:
	R 0-43; D 54-0, March 30, 1993)
	Baucus voted three times for cloture, which
	would have limited debate and allowed a vote for
•	the Clinton plan. Baucus voted for (CQ Vote
	#100: Motion rejected 55-43: R 0-42; D 55-1,
	April 2, 1993); (CQ Vote #101: Motion rejected
	52-37: R 0-37; D 52-0, April 3, 1993); and (CQ):
•	Vote #102: Motion rejected 49-29: R 0-28; D
,	49-1, April 5, 1993)
	Baucus once again voted against eliminating the
•	"stimulus" aspects of the plan. (CQ Vote #103:
	Motion agreed to 53-45: R 0-41; D 53-4, April
	20, 1993)
	事

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To: Rebberg Team

Company:

Phone:

Fax:

From: Ladozna Y. Lee

Company: The Eddie Make Company

Phone: 202-842-4160 Fax: 202-842-4442

Date: 04/30/96

Pages including this cover page: 2

It appears from the NRSC documentation package on its radio that in fact Max did not vote for a casino and an alpine slide but rather that it was from a National Conference of Mayors "ready to go" book that Cisneros told Congress he would work from. So we probably can't attack Max for using his out of state dollars to lie about his record. That leaves us with the "guilty charge."

Our best approach would be for the NRSC to run radio stating that Max is guilty of running a guilt by association campaign. Naming unnamed "out of state Republicans" guilty when in fact none of the findings have determined anyone guilty and the only political organizations that have had to pay fines to the FEC in the last xxxx years is the Democrat state party and Democrat office holders (Williams?) THIS NEEDS TO BE DETERMINED TO BE FACT.

Max is using his millions of out of state special interest money trying to get the fair people of Montana to believe that Deany Rebberg associates with people who are guilty none of the thousands of hours of legal proceedings investigating Democrat Chairman Kelly Addy's allegations from 1988 have resulted in a single Republican organization being fixed. Come on Max use your millions of deliars of out of state of special interest money to tell the voters of Montana what this race is really about. You want a government that continues to take 40% of everyone's pay check and Denny Reaserg wants to cut taxes and spending. Quit the name calling Max and lets talk about Montana and the real issues people care about.

DEPOSITION EXHIBIT

11-18.97

This message probably does not lit into the issue advertising that the NRSC can do with non allocable dollars. Thus, we must determine what we can do to offset the barrage of messages saying Deany is "guilty" which can only accrue to Borchert's benefit. By the same token we cannot afford to begin the "cannonball strategy" of using our limited resources saying "I'm not guilty".

We need a press strategy. Pat Stinson has called to invite Denny on his show tomorrow morning at 8:30 MST. We have as possible press advocates but we can't olise! Max's thousands or 35 or ratio with just a press release.

This also calls for a Max watch and possibly we could release the entire list of "ready to go" projects and call on Max to say which ones he would have supported if it wasn't the casino or the Alpine Slide.

We need to decide today what we are going to do. Mike, Tony - Phil did not believe that the NRSC would do the paid response but suggested we talk to Craig the legal counsel. If I hear from either of you before 11:00 we can call together or I will follow-up directly.

NOTICE OF CONFIDENTIALITY: The information contained in this facsimile transmission is legally privileged and confidential, being intended only for the named recipient. Therefore, dissemination, distribution, or copying by other than the intended recipient is prohibited. If you have received this transmission in error, please notify us immediately by collect call and return the transmission to the address below the

DEPOSITION

EXHIBIT



RSC NEWS

NATIONAL REPUBLICAN SENATORIAL COMMITTEE

Chairman Senant Alfonse D'Amere

FOR IMMEDIATE RELEASE: WEDNESDAY, MAY 8, 1996 NRSC96/112

CONTACT: NRSC PRESS OFFICE DAN McLAGAN 202/675-6006

NEW GOP AD: BAUCUS VOTES FOR MORE TAXES, INCREASED DEBT. HIGHER PAY FOR HIMSELF

NRSC RADIO CAMPAIGN URGES MONTANANS TO CONTACT BAUCUS: AD SAYS BAUCUS SHOULD VOTE TO BALANCE THE BUDGET NOW

Washington, DC - The National Republican Senatorial Committee today began running a new radio spot in Montana chronicling Senator Baucus' record of raising taxes, increasing the federal debt and raising his own pay. The spot urges Montanans to contact Baucus to encourage him to balance the federal budget now.

The following sixty-second radio spot will air in Montana:

"The top movie is 'Godfather Part II.'

'Streaking,' becomes a national fad

Max Baucus goes to Washington, and our national debt is \$484 billion.

A lot's changed in 21 years - for example, Max Baucus' salary has more than tripled, from \$42,000 to \$133,000 a year. And the national debt has skyrocketed to \$5 trillion

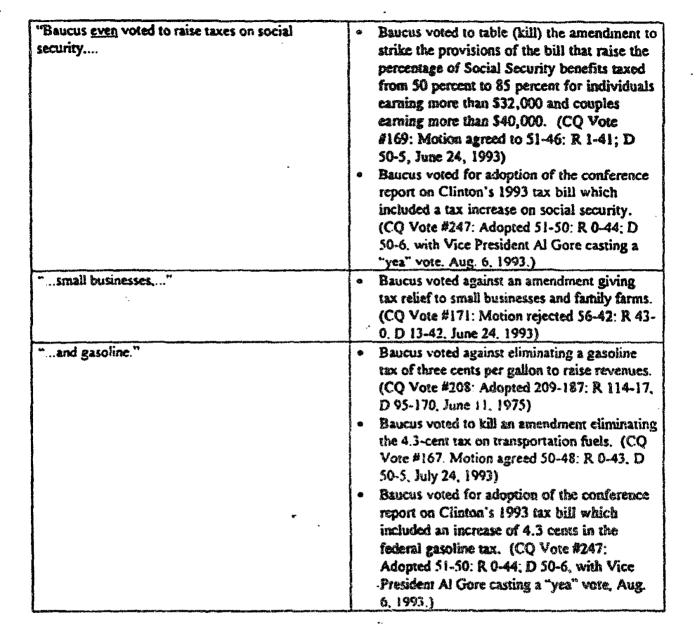
What have we gotten from Baucus' 21 long liberal years? More taxes and more debt. Liberal Baucus voted for five of the largest fax increases in American history. In one wate alone, he increased taxes on Montana families by \$2,600 a year.

Baucus even voted to raise taxes on Social Security, small husinesses, and gasoline

Call liberal Max Baucus. Tell him to balance the budges. Tell him he was wrong to raise taxes and spend us into debt. Tell him to vote for the majority's plan to balance the budget.

Paid for by the National Republican Senatorial Committee." See Attached 2 Page Documentation





NRSC

DRAFT NRSC RADIO:60 - "1974-BAUCUS"

Music up and under

ANNCR:

1974.

The top movie is "Godfather Part IL"

(SFX under Anner. - Machine gun fire)

"Streaking," becomes a national fad.

(SFX under Anner. = teensger yelling/running outdoors)

Max Baucus goes to Washington, and our national debt is \$484 billion.

A lot's changed in 21 years - for example, Max Baucus's salary has more than tripled, from \$42,000 to \$133,000 a year.

And the national debt has skyrocketed to \$5 trillion.

What have we gotten from Baucus's 21 long liberal years?

More taxes and more debt.

Liberal Baucus voted for five of the largest tax increases in American history. In one vote alone, he increased taxes on Montana families by \$2600 a year.

Baucus even voted to raise taxes on social security, small businesses, and gasoline.

Call liberal Max Baucus. Tell him to balance the budget. Tell him he was wrong to raise our taxes and spend us into debt. Tell him to vote for the majority's plan to balance the budget.

Paid for by the National Republican Senatorial Committee



BAUCUS RECORD

ر دار همی برای از این از ای این از این ا	
"1974 Max Baucus goes to Washington, and our national debt is \$484 billion."	 Baucus was elected to federal office in 1974. He has spent over 2! years in Washington. (source: The Almanac of American Politics, 1996)
·	 Total gross federal debt in 1974 was \$483.893 million (amuses: fiministical Abstract of the United States, 1995)
"Max Baucus' salary has more than tripled. from \$42,000 to \$133,000 a year."	 Baucus' salary has risen from \$42,500 in January, 1975 to \$133,600 in 1996. (source: 1991 CQ Almanac; CQ Weekly Report, 1/2/93)
"And the national debt has skyrocketed to \$5 trillion."	 The national debt as of Wednesday, April 17, 1996, was \$5,146,356,518,536.99. (The Washington Times, 4/19/96)
"Liberal Baucus voted for five of the largest tax increases in American history."	Clinton Tax Increase of 1993, Conference Report (CQ Vote #247, 1993) (\$241 billion over five years*)
	Budget Reconciliation Tax Increases of 1982, Conference Report (CQ Vote #337, 1982) (\$138 billion over four years*)
	 Budget Reconciliation of 1987, Conference Report (CQ Vote #419, 1987) (\$54 billion over four years*)
	Deficit Reduction Act of 1984, Conference Report (CQ Vote #161, 1984) (\$48.3 billion over 4 years*)
	Social Security Act Amendments of 1983, Conference Report (CQ Vote #54, 1983) (\$36.7 billion over four years*)
·	* (Tay Fraudation Press Release, 9/2/92)
"In one vote slone, he increased taxes on Montana families by \$2,500 a year."	 Baucus voted for adoption of the conference report. (CQ Vote #247: Adopted \$1-50: R 0- 44: D 50-6, with Vice President Al Gore casting a "yea" vote, Aug. 6, 1993.)
	The Heritage Foundation, in an April 7, 1994, study emitled "The State and District Impact of The Clinton Tax Increase," calculated that the 1993 Clinton/Baucus tax bill will cost Montana's taxpayers \$541,779,082 over five years, or \$668.04 for every man, woman and child in Montana.
	• (family of four) fiff (if it it is first for the first

Daucus voted to table (Kill) the amendment to "Baucus even voted to raise taxes on social strike the provisions of the bill that raise the security.... percentage of Social Security benefits taxed from 50 percent to 85 percent for individuals earning more than \$32,000 and couples earning more than \$40,000. (CO Vote #169: Motion agreed to 51-46: R 1-41: D 50 S. Juna 24, 1993) Baucus voted for adoption of the conference terret on Climon's 1993 ax bill which included a my incomes on eccial accusity (CQ Note \$347; Adopted \$1 \$0; RO 44, D 50-6, with Vice Pretident Al Gore cacting a "yea" vote, Aug. 6, 1993.) Liaucus voted against an amendnient grving small businesses. tax relief to small businesses and family farms. (CQ Vote #171: Motion rejected 56-42: R 43-0, D 13-42, June 24, 1993) Baucus voted against eliminating a gasoline and gasoline. tax of three cents per gallon to raise revenues. (CO Vote #208; Adopted 209-187; R 114-17, D 95-170, June 11, 1975) Baucus voted to kill an amendment eliminating the 4.3-cent tax on transportation fuels. (CQ Vote #167: Motion agreed 50-48: R 0-43, D 50-5. July 24, 1993) · Baucus voted for adoption of the conference report on Clinton's 1993 tax bill which included an increase of 4.3 cents in the federal gasoline tax. (CQ Vote #247: Adopted \$1-50; R 0-44; D 50-6, with Vice President Al Gore casting a "yea" vote, Aug. 6. 1993.)



LICAN SENATORIAL COMMITT

Chairman, Senson Alfanse D'Amoro

POR IMMEDIATE RELEASE: **SUNDAY, MAY 12, 1996** NRSC96/122

CONTACT: NRSC PRESS OFFICE DAN MCLAGAN 202/675-6006

NEW NRSC TV AD TO BAUCUS: SUPPORT A BALANCED BUDGET

STATEWIDE MONTANA TV AD CAMPAIGN BEGINS AIRING THIS WEEKEND

Washington, DC -- The following is the text of a new 30 second statewide TV spot from the National Republican Senatorial Committee urging Montana Senator Max Baucus to support a balanced federal budget:

TV/30 Seconds Title: "1974-Baucus"

> 1974: Liberal Max Baucus goes to Washington. Your share of the national debt: \$2,300.

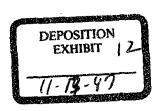
22 long liberal years later. Government spending explodes. Baucus votes for five of the biggest tax increases in history.

Your share of the national debt: \$19,000. What else is up?

Baucus's salary — it's tripled to \$133,000.

We need a balanced budget.

Call liberal Max Baucus, and tell him to support the Majority's balanced budget plan.



NRSC TV:30 - "1974—BAUCUS" FINAL AUDIO

VIDEO

GRAPHICS: 1974

Baucus still (any of '74 vintage?)

(possibly in sepia)

GRAPHICS: Your share of national debt -

\$2300

GRAPHICS: 1996

Headline on Spending

GRAPHICS: Baucus votes for five of the biggest tax increases in American history

GRAPHICS: Your share of national debt = \$19,000

MOVING UPWARD ARROW AGAINST GRAPH LABELED BAUCUS SALARY Arrow ends at \$133,000

Baucus pix
GRAPHICS: Call Max Baucus/Phone
#??/Balance the Budget

Disclaimer

OICUA

ANNCR:

1974.

Liberal Max Baucus goes to Washington.

Your share of the national debi -- \$2300.

22 long liberal years later. Government spending explodes.

Baucus votes for five of the biggest tax increases in history.

Your share of the national debt -- 519.000.

What else is up?

Baucus's salary. It's tripled to \$133,000.

We need a balanced budget,

Call liberal Max Baucus and tell him to support the majority's balanced budget plan.

NRSC TV:10 - "HEY MAX" FINAL AUDIO

VIDEO

Baucus Pix

GRAPHICS: Max Baucus/Stop Increasing

Our Taxes and Your Pay

Disclaimer

AUDIO

ANNCR:

Hey Max!

Stop reising our taxes and your pay.

Call Max Basess and tell him to support the majority's balanced budget plan!





NATIONAL REPUBLICAN SENATORIAL COMM

Chairman, Senator Alfonte D'Amato

FOR IMMEDIATE RELEASE: TUESDAY, MAY 28, 1996 NRSC96/140

CONTACT: NRSC PRESS OFFICE DAN McLAGAN 202/675-6006

NEW GOP AD URGES BAUCUS TO BALANCE THE BUDGET

Washington, DC - The following is the text of a new 30 second TV spot which began airing statewide in Montana on Friday from the National Republican Senatorial Committee urging liberal Senator Max Baucus to support a balanced budget.

TV/30 Seconds Title: "Twenty-two"

By one vote, the Senate passed the largest tax increase in history. That one vote...Max Baucus.

He voted for more taxes on Social Security, gasoline and family farms.

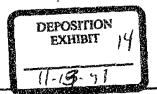
It's no surprise.

For twenty-two long liberal years, Baucus has spent our money and raised our taxes. He's the sixth biggest spender in the Senate.

Max Baucus...definitely a liberal.

Call. Tell Baucus to vote for the majority's plan to balance the budget.

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NRSCNEWS '96

NATIONAL REPUBLICAN SENATORIAL COMMITTEE

Chairman, Senator Alfonse D'Amato

FOR IMMEDIATE RELEASE FRIDAY, MAY 31, 1996 NRSC96/149 CONTACT: NRSC PRESS OFFICE DAN McLAGAN 202/675-6006

NEW GOP AD URGES BAUCUS TO SUPPORT BALANCED BUDGET PLAN

Washington, D.C. -- The following is a text of a new 30 second TV spot which begins airing today in Montana. The ads are paid for by the National Republican Senatorial Committee and are aimed at urging Montana Senator Max Baucus to support the majority's balanced budget plan.

VIDEO

AUDIO

(Music Up & Under)

Hand press button to start tape recorder Fue ilt and burns supered over video

Hands pick up Baucus photo from manilla file folder marked TOP SECRET in block stencil lattering

Hand flips to next piece of paper with GRAPHICS (block stencil lettering): Max Baucus/Voted for S of the Biggest Tax Increases in American History

Hand flips to piece of paper with GRAPHICS (block stencii lettering): Max Baucus/Voted to Raise Taxes on: Social Security/Family Farms (smaller date = \$6/93)

ANNCR:

Good Morning, Mr. Phelps.

This is Max Baucus, liberal from Montana.

Haucus disguises his record.

Baucus voted for five of the biggest tax increases in history.

Baucus voted to raise taxes on Social Security and lamily farms.

Tape recorder playing

Your mission, which may be impossible, is to get Baucus to support the majority's balanced hudget plan.

Good Luck, Jim.

ANNCR:

Hand presses off button on tape recorder

(800) 332-6106

Help Jim. Call liberal Max Baucus. This message will self-destruct in one second.

(SFX = Hissing as tape dissolves)

Disclaimer

Music Under & Out

DEPOSITION EXHIBIT

ROHALD REAGAN REPUBLICAN CENTER • 425 SECOND STREET, N.E. • WASHINGTON, D.C. 20002

Paid for and supported by the National Republican Senatorial Committee



THE EDDIE MAHE COMPANY

To: Steve McCarter

Company: Phone: Fax:

From: Ladonna Y. Lee

Company: The Eddie Mahe Company

Phone: 202-842-4100 Fax: 202-842-4442

Date: 06/07/96

Pages including this cover page: 1

First — we have answered all the questions — any new questions are only to keep us on the defensive SO my suggestion would be

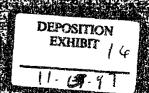
You know this is old news and a fight between Max Baucus and the National Republican Senatorial Committee. I have no capacity to keep them from running the ads. Its their business.

Max fully knows these ads are not violating the law because they do not fall under the label of "partisan communications" as defined by the FEC which must "expressly advocate the election or defeat of a federal candidate"

Max has been happy to accept the help of the unions, the environmentalists and Emily's list. And, now the Montana Democrat party is paying for a piece of mail for Max saying that finally after 21 years in Washington, he, Max Baucus, now agrees with me, Denny Rehberg, on balancing the budget, welfare reform, and that Montana is a great place to live and raise a family. So I know he and his family will be real happy to move here next January and live.

Further, Max thought it was OK to use our tax dollars to put out a piece of mail from his Senate office saying how terrible Newt Gingrich and the Republicans in the House are

Lets play by the same rules Max.



Max doesn't believe in the same rules for both sides. Maybe if he wasn't ashamed of all those votes when he voted against Montana's interests he wouldn't be yelling so loudly now.

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NRSCNEWS '96

NATIONAL REPUBLICAN SENATORIAL COMMITTEE

Chairman, Senator Alfonse D'Amato

FOR IMMEDIATE RELEASE FRIDAY, JUNE 21, 1996 NRSC96/179 CONTACT: NRSC PRESS OFFICE

DAN McLAGAN

202/675-6006

NRSC LAUNCHES NEW MONTANA TV ADS

SPOTS URGE BAUCUS TO SUPPORT BALANCED BUDGET

WASHINGTON, D.C. - The following is the script of a new NRSC television ad that begins airing in Montana today.

AUDIO

In his 22 long liberal years, Max Baucus has voted over 50 times to raise taxes.

Baucus even voted to raise taxes on Social Security, Medicare recipients, small businesses and the family farm.

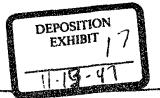
Max, you can't hide from your record -- you're definitely a liberal.

Call, tell liberal Max Baucus to support the majority's plan to balance the budget and cut our taxes.

VIDEO

Scrolling list of Baucus votes for more taxes

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AD TEXT (ANNCR#1)

BAUCUS RECORD

"In his 22 long liberal years,"	Baucus has been in federal office since 1975. He has spent 22 years in Washington. (The Almanac of American Politics, 1996)
"Max Baucus has voted over 50 times to raise taxes."	• Max Baucus has voted to raise taxes over 50 times. (CQ Vote #339, 1993;) CQ Vote #335, 1993; CQ Vote #327, 1993; CQ Vote #247, 1993; CQ Vote #244, 1993; CQ Vote #190, 1993; CQ Vote #167, 1993; CQ Vote #169, 1993; CQ Vote # 82, 1993; CQ Vote # 79, 1993; CQ Vote # 66, 1993; CQ Vote # 68, 1993; CQ Vote # 66, 1993; CQ Vote # 60, 1993; CQ Vote # 59, 1993; CQ Vote # 57, 1993; CQ Vote # 59, 1993; CQ Vote # 57, 1993; CQ Vote # 58, 1993; CQ Vote # 54, 1992; CQ Vote # 48, 1992; CQ Vote # 54, 1992; CQ Vote # 48, 1992; CQ Vote # 54, 1992; CQ Vote # 48, 1992; CQ Vote # 54, 1992; CQ Vote # 48, 1992; CQ Vote #285, 1990; CQ Vote #280, 1990; CQ Vote #236, 1989; CQ Vote #170, 1988; CQ Vote #241, 1987; CQ Vote # 87, 1987; CQ Vote # 86, 1986; CQ Vote # 87, 1987; CQ Vote # 87, 1987; CQ Vote # 88, 1984; CQ Vote #379, 1985; CQ Vote # 88, 1984; CQ Vote # 51, 1983; CQ Vote # 88, 1984; CQ Vote # 54, 1983; CQ Vote # 58, 1984; CQ Vote # 54, 1983; CQ Vote # 58, 1984; CQ Vote # 54, 1983; CQ Vote # 58, 1984; CQ Vote # 54, 1983; CQ Vote # 88, 1984; CQ Vote # 54, 1983; CQ Vote # 58, 1984; CQ Vote # 54, 1983; CQ Vote # 58, 1984; CQ Vote # 54, 1983; CQ Vote # 58, 1984; CQ Vote # 410, 1982; CQ Vote # 58, 1984; CQ Vote # 410, 1982; CQ Vote # 58, 1984; CQ Vote # 410, 1982; CQ Vote # 58, 1984; CQ Vote # 441, 1983; CQ Vote # 58, 1984; CQ Vote # 444, 1983; CQ Vote # 58, 1984; CQ Vote # 444, 1983; CQ Vote # 58, 1984; CQ Vote # 4484, 1979; CQ Vote # 286, 1981; CQ Vote # 4805, 1978; CQ Vote # 4491, 1976; CQ Vote # 4805, 1978; CQ Vote # 499, 1979; CQ Vote # 68, 1975; CQ Vote # 548, 1975; CQ Vote # 547, 1975; CQ Vote # 58, 1975; CQ Vote # 547, 1975; CQ Vote # 58, 1975; CQ Vote # 547, 1975; CQ Vote # 58, 1975; CQ Vote # 547, 1975; CQ Vote # 288, 1975; CQ Vote # 547, 1975; CQ Vote # 288, 1975; CQ Vote # 547, 1975; CQ Vote # 288, 1975; CQ Vote # 547, 1975; CQ Vote # 18, 1975;

it is about an

"Baucus even voted to raise taxes on Social Security"	 Baucus voted to table (kill) the amendment to strike the provisions of the bill that raise the percentage of Social Security benefits taxed from 50 percent to 85 percent for individuals earning more than \$32,000 and couples earning more than \$40,000. (CQ Vote #169: Motion agreed to 51-46, June 24, 1993) Baucus voted for adoption of the conference report on Clinton's 1993 tax bill which included a tax increase on social security. (CQ Vote #247: Adopted 51-50, Aug. 6, 1993.)
" Medicare recipients,"	Baucus voted for the adoption of he conference report on the bill to cap the amounts for which Medicare beneficiaries will be financially liable for Medicare-coverd services and to make other changes in the program. Included in the bill were increased monthly flat-premium benefits and an income tax surcharge on Part A eligible elderly. (CQ Vote #170: Adopted 86-11: R 34-11, D 52-0; June 8, 1988)
" small businesses,"	 Baucus voted against an amendment giving tax relief to small businesses and family farms. (CQ Vote #171: Motion rejected 56-42: R 43-0, D 13-42, June 24, 1993) Baucus voted for adoption of the conference report on Clinton's 1993 tax bill which included a tax increase on farms, small businesses, and individuals. (CQ Vote #247: Adopted 51-50, Aug. 6, 1993.)
" and the family farm."	 Baucus voted against an amendment giving tax relief to small businesses and family farms. (CQ Vote #17): Motion rejected 56-42: R 43-0, D 13-42, June 24, 1993). Baucus voted for adoption of the conference report on Clinton's 1993 tax bill which included a tax increase on farms, small businesses, and individuals. (CQ Vote #247: Adopted 51-50, Aug. 6, 1993.)

Dear Max

Thank you for signing the clean campaign pledge. As you know, our opponent, Becky Shaw did so on Tuesday??

I have communicated with the Republican National Committee and the National Republican Senatorial Campaign Committee that you have agreed to run a campaign according to the pledge. I have included copies of yours and my campaign ads which clearly show that all of my advertising in the campaign has been done according to the pledge.

Your letter contains some additional suggestions for our joint agreement on campaign advertising and I would be happy to sit down and negotiate those additional requests with you. I would also like you to agree to the spending limit you suggested on May 22, 1995 to spend no more then \$1.2 million. (this is what I got from my clips Steve)

You have threatened that you will not abide by the Clean Campaign Pledge if the NRSC does not remove their ads. The Pledge that you and I have signed states:

"to request all interested third parties, who may engage in issue advertising that may agree with my positions on the issues, to abide by all the above;"

I have done so. See copy of letters attached.

Your demand that the NRSC advocacy ads be done in my voice which is ... as you well know ... a violation of the Supreme Court ruling handed down on Tuesday which clearly states:

"the First Amendment [cannot be used to prohibit] an expenditure that the political party has made independently, without coordination with any candidate".

I have not been involved in any of the decisions or discussions on the NRSC ads nor any other ads done in the state by third parties. Nor have I violated the law as you suggested in our debate last Saturday when you said

quote I strongly suspect that DR is coordinating independent expenditures

(Steve - need quote from debate transcript)

Max the voters of Montana want to know how we have voted in the past on important issues such as balancing the budget and tax relief for working families and how we will vote for the next 6 years ... That will be the focus of my ads and my campaign and I am sure the voters are looking forward to a healthy discussion of our differences.

DEPOSITION EXHIBIT (8

Let me know if you will commit to your original discussion to limit spending.

Have a great week

You know that your demand for me to